



Cabot Corporation  
Two Seaport Lane  
Suite 1300  
Boston, MA 02210-2019  
United States

January 28, 2020

Cheryl Seager  
Director, Enforcement and Compliance  
Assurance Division  
U.S. Environmental Protection Agency, Region 6  
1201 Elm Street, Suite 500  
Dallas, TX 75202-210

Phillip Brooks  
Director, Air Enforcement Division  
Office of Enforcement and Environmental Compliance  
U.S. Environmental Protection Agency  
MC 2242A, Room 1119B  
1200 Pennsylvania Avenue, NW  
Washington, D.C. 20460

Thomas A. Mariani  
Chief, Environmental Enforcement Section  
Environment and Natural Resources Division  
U.S. Department of Justice  
150 M Street, NE  
Room 2.900  
Washington, D.C. 20002

Celena Cage  
Administrator, Enforcement Division  
Office of Environmental Compliance  
Louisiana Department of Environmental Quality  
602 North Fifth Street  
Baton Rouge, LA 70802

Brandon B. Williams, LA BAR Roll# 27139  
Attorney  
Office of the Secretary, Legal Division  
Louisiana Department of Environmental Quality  
602 North Fifth Street  
Baton Rouge, LA 70802

**RE: Semi-annual Compliance Reports for the Canal, Pampa, and Ville Platte Plants for the Reporting Period July 1, 2019 – December 31, 2019, Consent Decree # 6:13-CV-03095; March 11, 2014; AI # 19901 & 1291**

Dear Madam or Sir,

In compliance with Section XII, Paragraph 49 of the Consent Decree between the United States of America, the Louisiana Department of Environmental Quality and Cabot Corporation, Cabot is hereby submitting its Semi-annual Compliance Reports for the above referenced plants and reporting period.



Cabot Corporation  
Two Seaport Lane  
Suite 1300  
Boston, MA 02210-2019  
United States

*I certify under penalty of law that this document and all attachments were prepared under my direction or supervision in accordance with a system designed to assure that qualified personnel properly gather and evaluate the information submitted. Based on my inquiry of the person or persons who manage the system or those persons directly responsible for gathering the information, the information is, to the best of my knowledge and belief, true, accurate and complete. I am aware that there are significant penalties for submitting false information and including the possibility of fine and imprisonment for knowing violations.*

Best regards,

A handwritten signature in black ink, appearing to read "Martin O'Neill", with a long horizontal flourish extending to the right.

Martin O'Neill  
Senior Vice President — Safety Health & Environment

Attachments

cc: Gerard Caron, Gordon Reynolds, Cabot Corporation  
Bart Cassidy, Manko, Gold, Kitcher & Fox, LLP

**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**PAMPA PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

**a. A description of the construction of the Control Technologies, CEMS, and PM Early Warning Systems required by this Consent Decree, including:**

- i. *If construction is not underway, any available information concerning the construction schedule and the execution of major contracts.*

Construction is complete at the site, operational shake-down tests of the systems began in October 2016 with the unit achieving compliance with the EPA Consent Decree emission limits on March 15, 2017.

- ii. *Construction Schedule:*

Construction of the control systems and CEMs are complete.

- iii. *If construction is underway, the estimated percent of installation as of the end of the reporting period, the current estimated construction completion date, and a brief description of completion of significant milestones during the reporting period.*

Final construction was completed on 11/23/16.

- iv. *Any information indicating that installation and commencement of operation may be delayed, including the nature and cause of the delay.*

Consistent with the provisions of the Consent Decree, construction activity was completed, and shakedown testing began in October 2016. The unit has been placed in service but is still undergoing troubleshooting to demonstrate continuous compliance with TCEQ permit limits.

- v. *Once construction is complete, provide the dates the equipment was placed in service and/or commenced Continuous Operation and the dates of any testing that was performance during the period.*

On November 8, 2017, Cabot notified the US Environmental Protection Agency of a Force Majeure event affecting the operation of the SCR.

On May 1, 2018, Cabot requested an extension to the Force Majeure that was originally requested on November 8, 2017.

Consistent with the October 29, 2019, Joint Stipulation of Non-material Modification to the Consent Decree, the SCR was permanently removed from the NOx Control System based on the demonstration by Cabot that the NOx control system without the SCR was at least as effective as a SCR so as to achieve and maintain the applicable Emission Limits specified in Paragraph 26 of the Consent Decree.

**b. All information necessary to demonstrate compliance with all applicable Emissions Limits, 30-day Rolling Average Sulfur Content Weight Percent, 365-day Rolling Average Sulfur Content Weight Percent, and other provisions in Sections VI (SO<sub>2</sub> Control Technology, Emissions Limits, and Monitoring Requirements), VII (NOx Control Technology, Emissions Limits, and Monitoring Requirements) and VIII (PM Control Technology, Emissions Limits, Best Management Practices, and Early Warning System Requirements)**

- *Paragraph 22, Feedstock Sulfur Content Monitoring Requirements.*

On December 31, 2014, Cabot instituted feedstock sulfur monitoring, as required by Section VI, Paragraph 22



**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**PAMPA PLANT**

**REPORTING PERIOD:** July 1, 2019– December 31, 2019

pursuant to the terms of the Consent Decree to demonstrate compliance with the 30-day rolling average sulfur content weight percent as required by Paragraph 21. The supporting documentation is provided in Attachment 1.

Cabot continues to monitor its 365-day rolling average of the feedstock sulfur content weight percent during the reporting period. During this period, the 365-day rolling average feedstock sulfur content weight percent remained in full compliance with the limitations set in Section VI, Paragraph 21. The supporting documentation is provided in Attachment 1.

- *Paragraph 26 - NOx Process System Operation Emissions Limits and Control Technology*

The scope of work included the following major equipment:

- A high performance thermal oxidizer with a multi-stage burner system for the combined exhaust of ATUs GP-6 and GP-9;
- A SCR control system, to be installed in the flue gas streams of the ATU thermal oxidizers (removed, pursuant to the October 29, 2019, Joint Stipulation of Non-material Modification to the Consent Decree);
- A separate vent stack for the GP-9 casing gas stream and utilization of the existing GP-6 casing gas vent stack; and,
- A single vent stack downstream of the SCR.

The performance of the system meets the requirements of the Consent Decree.

- *Paragraph 32 and Appendix B - Other PM Control Requirements*

During the reporting period, Cabot achieved and maintained compliance with the requirements of Paragraph 32 and Appendix B the Consent Decree relative to particulate matter ("PM") control requirements. More specifically, for each PM emissions equipment unit:

- Cabot employed the relevant PM reduction mechanism and method for managing PM emissions specified in Appendix B of the Consent Decree.
- Cabot completed the relevant daily visual assessments, and maintained a record of the results of each such assessment.
- Cabot did not observe visible emissions as a result of any of the daily visual assessments during the reporting period. Accordingly, Cabot was not required during this reporting period to perform any six-minute Method 9 evaluation in response to an observation of visible emissions during the required daily visual assessments.

- *Paragraph 33 and Appendix C - Particulate Emissions Best Management Practices Control Plan*

Cabot implemented the Particulate Emissions Best Management Practices Control Plan set forth in Appendix C of the Consent Decree, to the extent required during the reporting period.

- *Paragraph 34 and Appendix D - PM Early Warning System*

Pursuant to the conditions of the Consent Decree, Cabot initiated compliance with applicable requirements of the Consent Decree related to the PM Early Warning System on March 11, 2015. During the reporting period,



**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**PAMPA PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

Cabot operated each PM Early Warning System at all times on Heat Load and Process System Operation, except during system breakdowns, repairs, maintenance, calibration checks, and zero and span adjustments of the applicable system, for each particulate monitor.

During the reporting period, Cabot achieved a data availability of greater than 95% based on a quarterly average of the operating time of the emission unit or activity being monitored, and therefore, achieved full compliance with the minimum degree of availability requirements of the Consent Decree. In addition, in response to any alarm triggered during the reporting period for any PM Early Warning System at the facility, Cabot investigated the cause of the alarm as expeditiously as practicable and performed the required sequence of tasks to respond to the alarm.

On each Operating Day in this reporting period, Cabot conducted a visual review of the recorded data for each PM Early Warning System to identify trends in relative PM emissions.

Cabot also conducted routine maintenance during the reporting period in accordance with manufacturer's recommendations as addressed within the provisions in Paragraphs D.8a and D.8b of the Consent Decree.

- c. All data collected for each Pampa Process System, from the time any 30-day Rolling Average Sulfur Content Weight Percent and/or 365-day Rolling Average Sulfur Content Weight Percent is exceeded until compliance is achieved, and an explanation of any periods of downtime of any relevant equipment that prohibited the collection of such data.**

During the reporting period, there were no periods of exceedance of the 30-day and/or 365-day rolling average sulfur content weight percent.

- d. All CEMS data collected for each Process System, from the time any Emissions Limit in Sections VI (SO<sub>2</sub> Control Technology, Emissions Limits, and Monitoring Requirements) and VII (NO<sub>x</sub> Control Technology, Emissions Limits, and Monitoring Requirements) is exceeded until compliance is achieved, and an explanation of any periods of downtime of such CEMS.**

- Paragraph 29 - NO<sub>x</sub> Monitoring Requirements

During the reporting period, the CEMS had 15 hours of downtime. There were no excess emissions events.

- f. All PM Early Warning System data collected, from the time a PM Early Warning System alarm is triggered until the PM Early Warning System data have returned to normal operating ranges, below levels triggering an alarm condition, and an explanation of any periods of PM Early Warning System downtime**

Data collected for each event in which a PM Early Warning System alarm was triggered during this reporting period is presented in Attachment 2.

A summary of the periods of PM Early Warning System downtime that occurred during unit operations, providing the required explanation for each such period, is presented in Attachment 3.

- g. A description of any violation of the requirements of this Consent Decree, including any violation resulting from Malfunctions, any exceedance of an Emissions Limit, any exceedance of a 30-day rolling Average Sulfur Content Weight Percent or 365-day Rolling Average Weight Percent, or any failure to install, commence operation or Continuously Operate and Control Technology or any PM Early Warning System, which includes:**

**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**PAMPA PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

- i. the date and duration of, and the quantity of any emissions related to, the violation;*
- ii. a full explanation of the primary root cause and any other significant contributing cause(s) of the violation;*
- iii. a root cause analysis of all reasonable interim and long-term remedial steps or corrective actions, including all design, operation, and maintenance changes consistent with good engineering practices, if any, that could be taken to reduce or eliminate the probability of recurrence of such violation, and, if not already completed, a schedule for its (their) implementation, or, if Defendant concludes that remedial steps or corrective actions should not be conducted, the basis for that conclusion.*

Cabot is not aware of any violation of the requirements of the Consent Decree during this reporting period.

***If no violations occurred during a reporting period, a statement that no violations occurred***

Cabot is not aware of any violation of the requirements of the Consent Decree during this reporting period.

***h. A description of the status of any permit applications and any proposed SIP revisions required under this Consent Decree***

Cabot filed a Standard Permit Application with the TCEQ, dated November 16, 2015 for the construction and operation of the pollution control equipment required by the Consent Decree for the Pampa Plant. Additional information was provided to the TCEQ during the review period. The permit for the project was issued by TCEQ on January 6, 2016, Standard Permit Registration Number 137239.

A revision was made to Standard Permit 137239 to relocate EPN 12D, GP9 ATU Dryer Vent on June 22, 2018. Release parameters were updated and/or corrected. The revision did not result in any changes to actual or permitted emissions from this source.

- i. A summary of all actions undertaken and Project Dollars expended during the reporting period, as well as any cumulative Project Dollars expended, and the estimated environmental benefits achieved to date in satisfaction of the requirements of Section V (Environmental Mitigation) and Appendix A.***

The project certification for these projects was submitted to the EPA on September 9, 2014 by Cabot.

**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**PAMPA PLANT**

**REPORTING PERIOD:** July 1, 2019– December 31, 2019

**ATTACHMENT 1**

**FEEDSTOCK SULFUR 30-DAY ROLLING AVERAGE AND 365-DAY ROLLING AVERAGE COMPLIANCE TRACKING DATA**

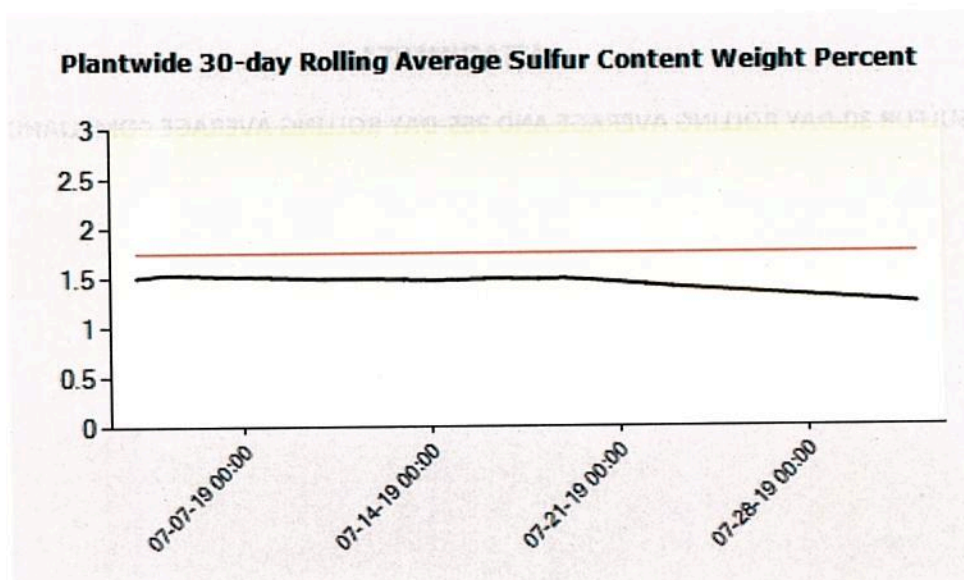


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

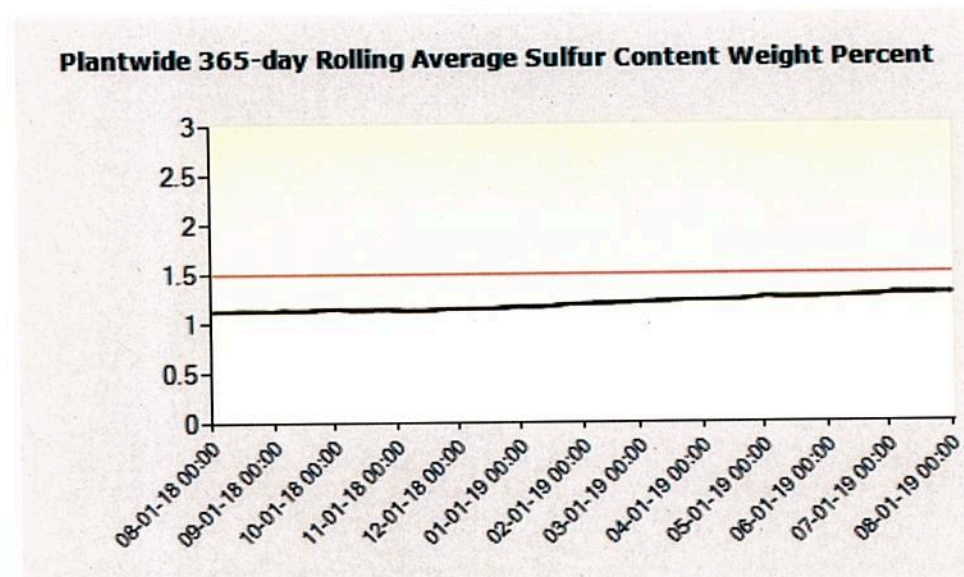
**PAMPA PLANT**

REPORTING PERIOD: July 1, 2019– December 31, 2019

*July*



30-day Rolling Average = 1.2344% (03-Jul-19 thru 01-Aug-19)



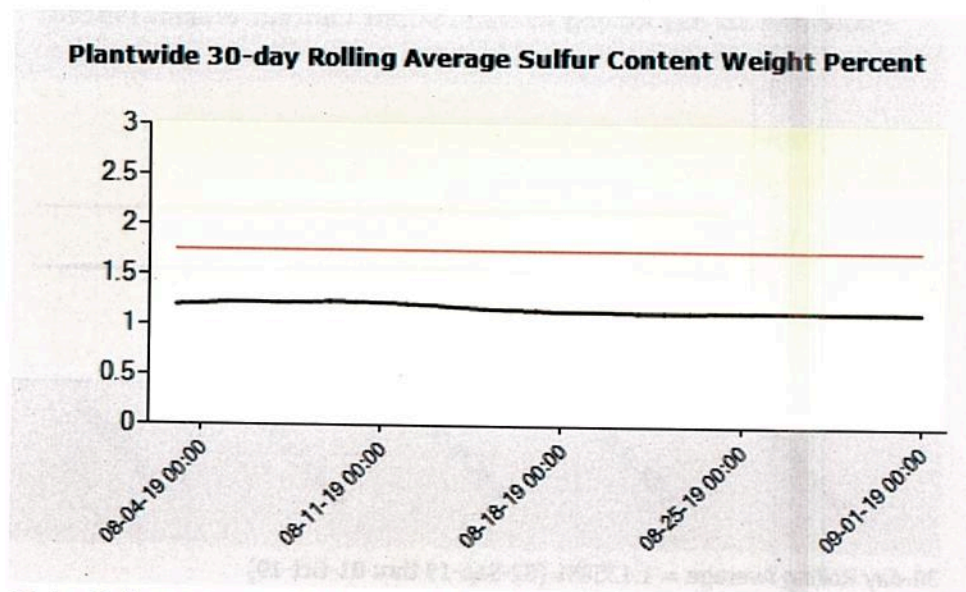
365-day Rolling Average = 1.2915% (02-Aug-18 thru 01-Aug-19)

*August*

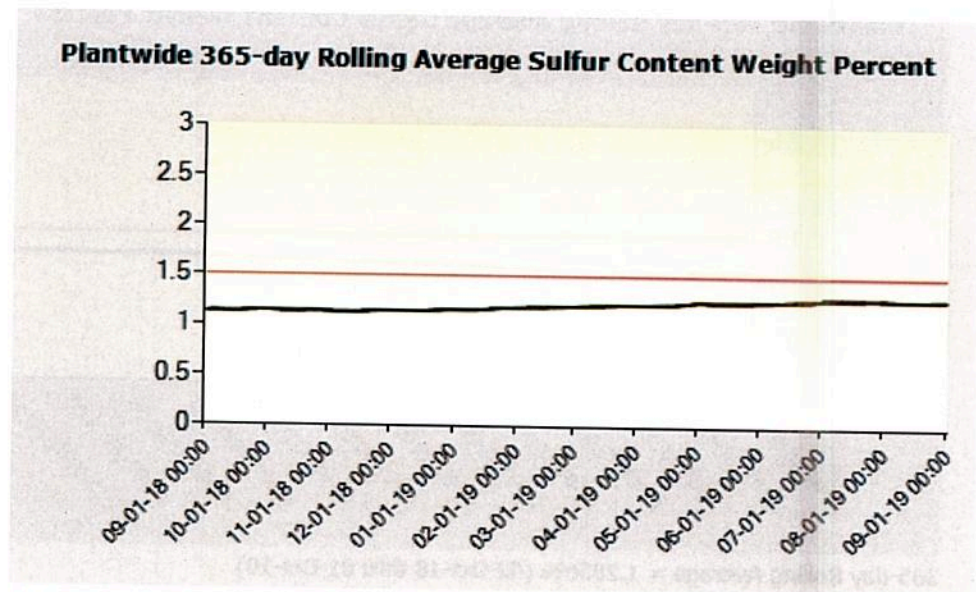
CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

REPORTING PERIOD: July 1, 2019– December 31, 2019



30-day Rolling Average = 1.1425% (03-Aug-19 thru 01-Sep-19)



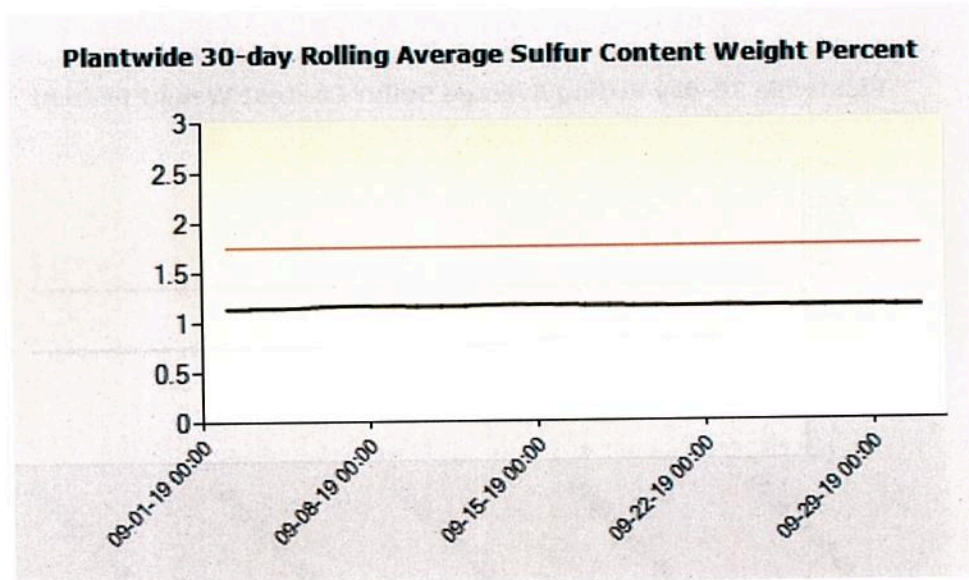
365-day Rolling Average = 1.2876% (02-Sep-18 thru 01-Sep-19)

*September*

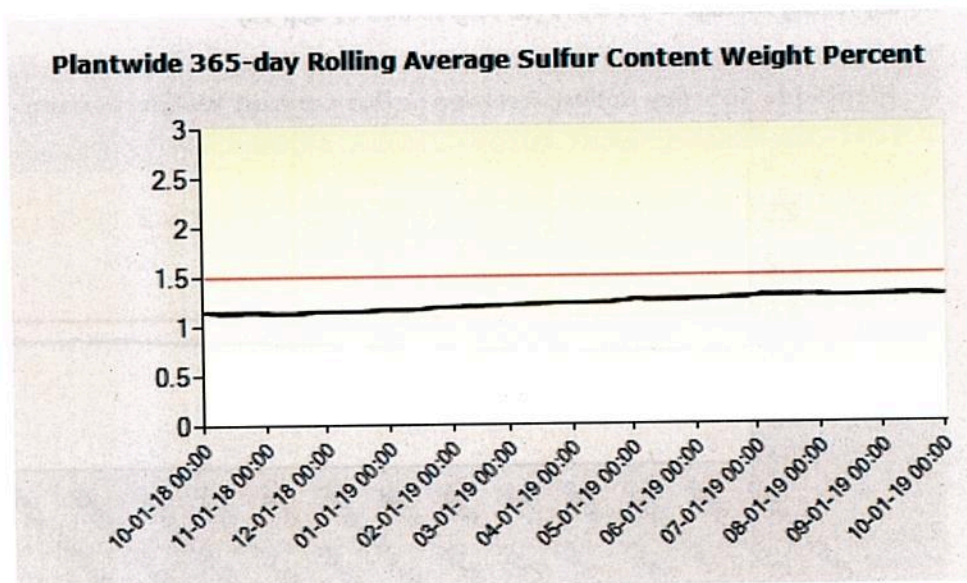
CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

REPORTING PERIOD: July 1, 2019– December 31, 2019



30-day Rolling Average = 1.1358% (02-Sep-19 thru 01-Oct-19)



365-day Rolling Average = 1.2856% (02-Oct-18 thru 01-Oct-19)

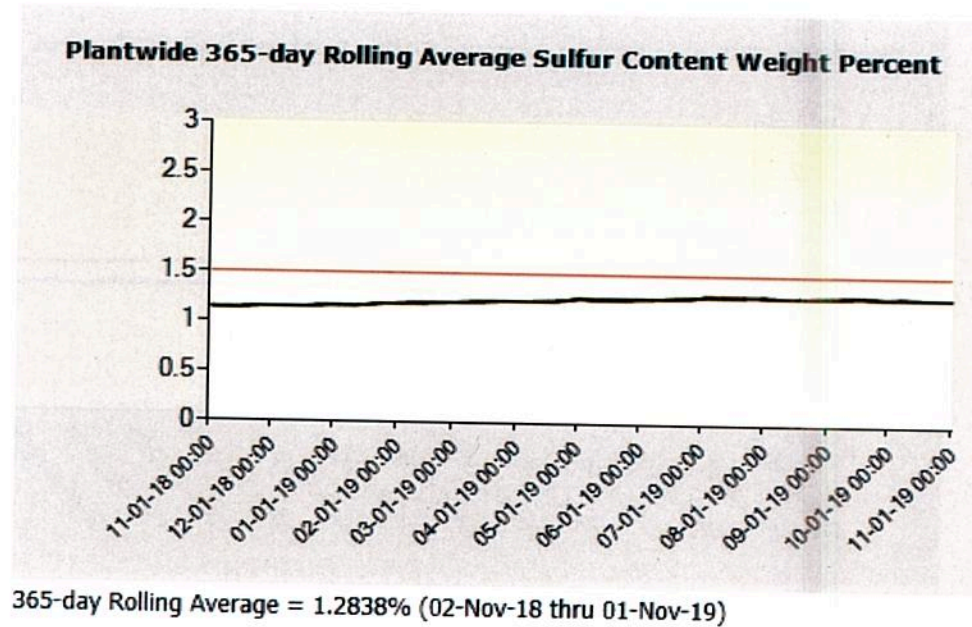
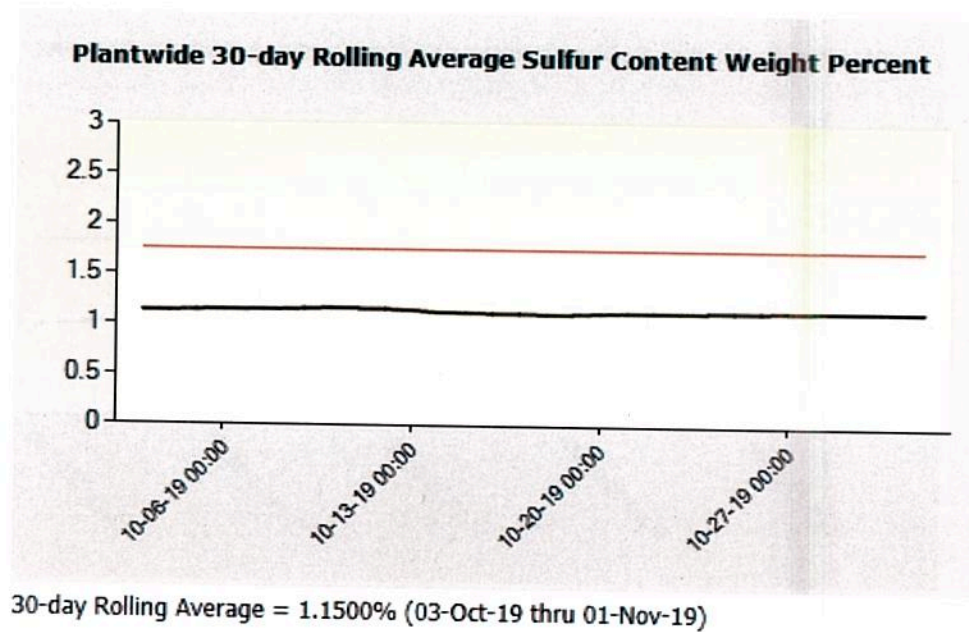
*October*



CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

REPORTING PERIOD: July 1, 2019– December 31, 2019

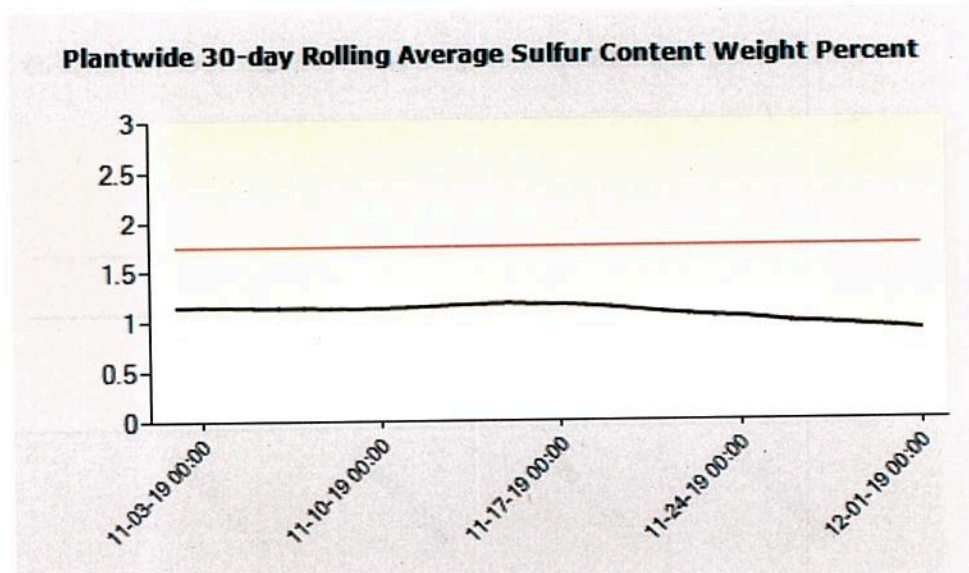


*November*

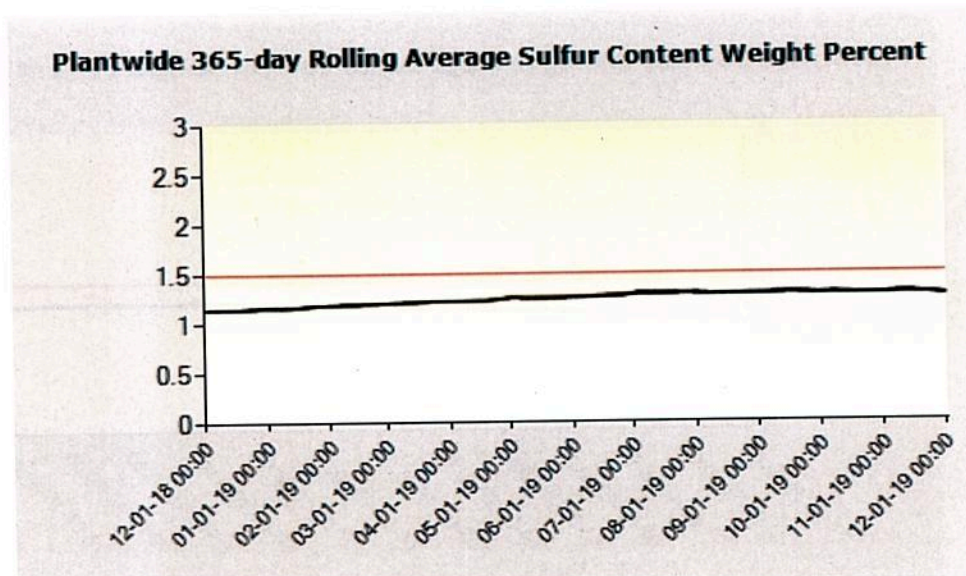
CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

REPORTING PERIOD: July 1, 2019– December 31, 2019



30-day Rolling Average = 0.8977% (02-Nov-19 thru 01-Dec-19)



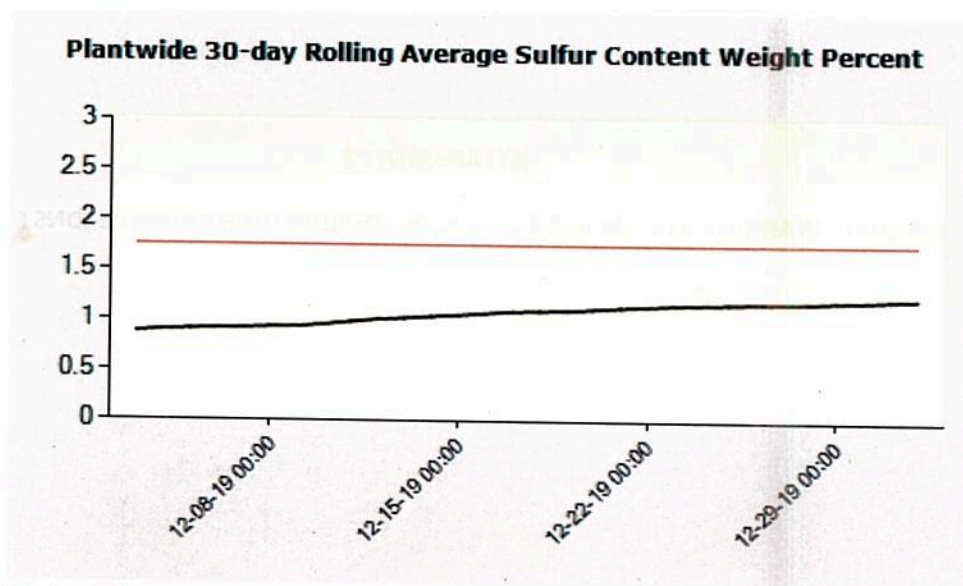
365-day Rolling Average = 1.2697% (02-Dec-18 thru 01-Dec-19)

*December*

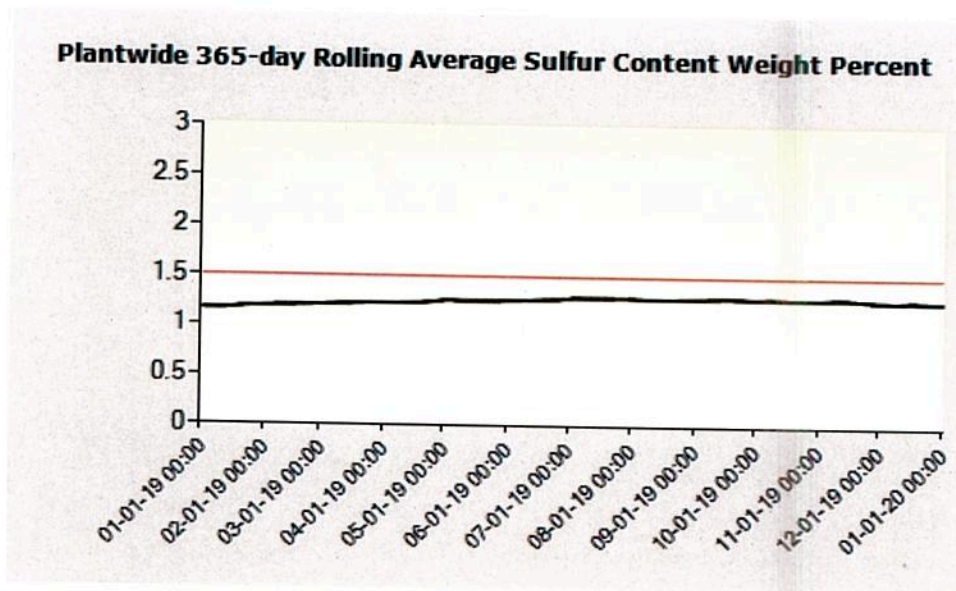
CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

PAMPA PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019



30-day Rolling Average = 1.2279% (03-Dec-19 thru 01-Jan-20)



365-day Rolling Average = 1.2634% (02-Jan-19 thru 01-Jan-20)



CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

REPORTING PERIOD: **July 1, 2019– December 31, 2019**

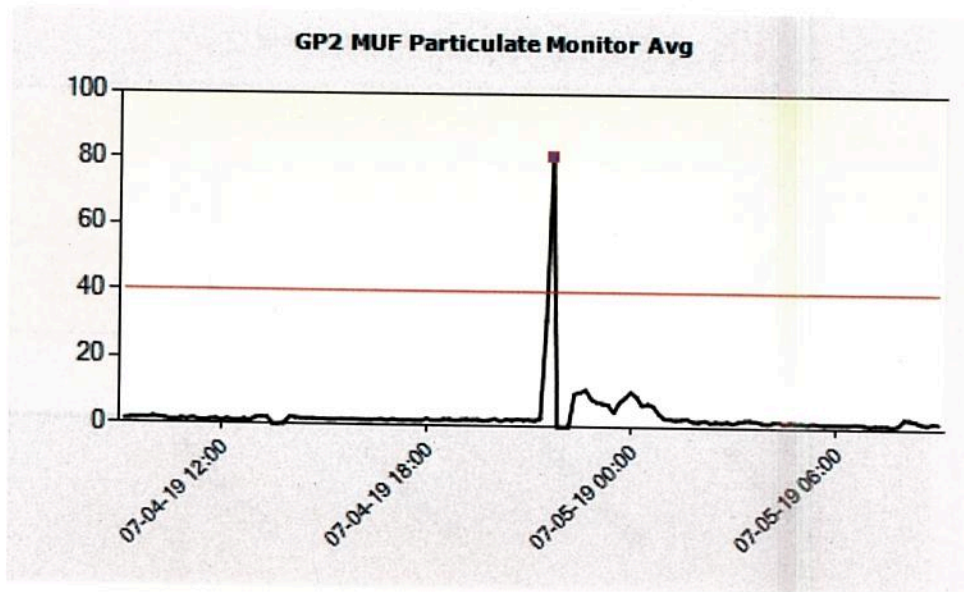
**ATTACHMENT 2**

**PM EARLY WARNING SYSTEM DATA COLLECTED DURING HIGH PM EMISSIONS EVENTS**

CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

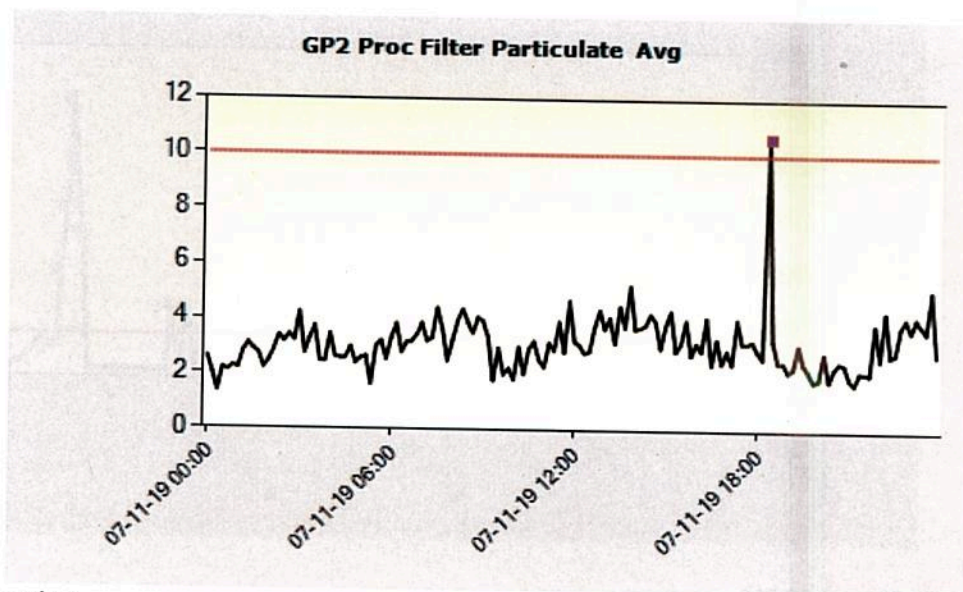
REPORTING PERIOD: July 1, 2019– December 31, 2019



Unit: GP-2 MUF

Date: July 4 9:40 PM- 9:50 PM

Description: Cleaning particulate monitor at start up



Unit: GP-2 Process Filter

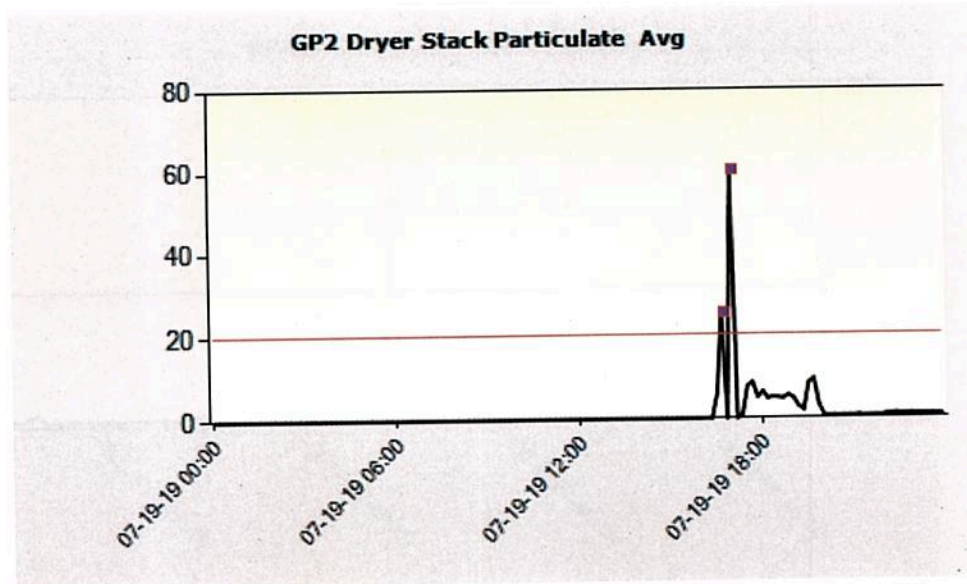
Date: July 11 6:20 PM-6:30 PM

Description: High pressure air was set too low

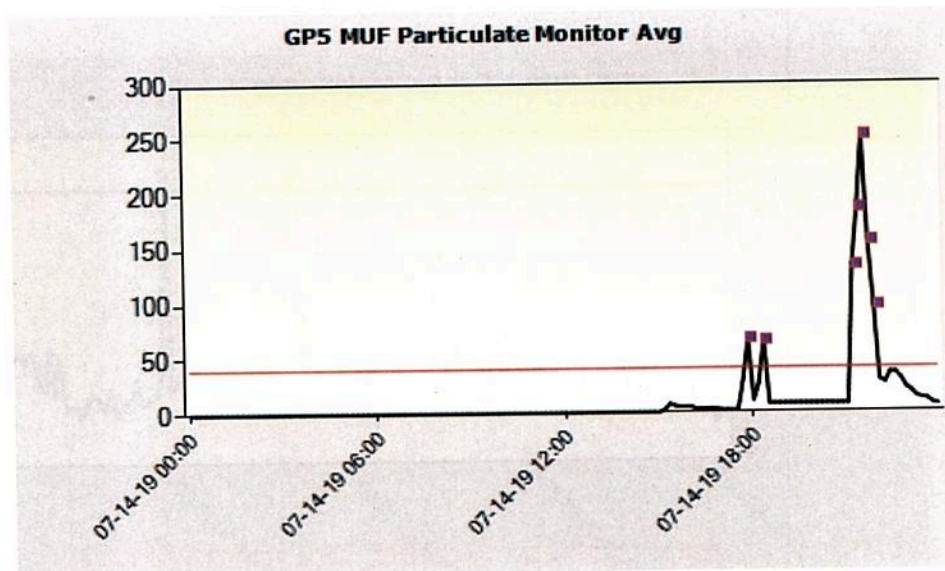
CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

REPORTING PERIOD: July 1, 2019– December 31, 2019



Unit: GP-2 Dryer Stack  
Date: July 19 4:40 PM- 5:10 PM  
Description: High moisture during start up



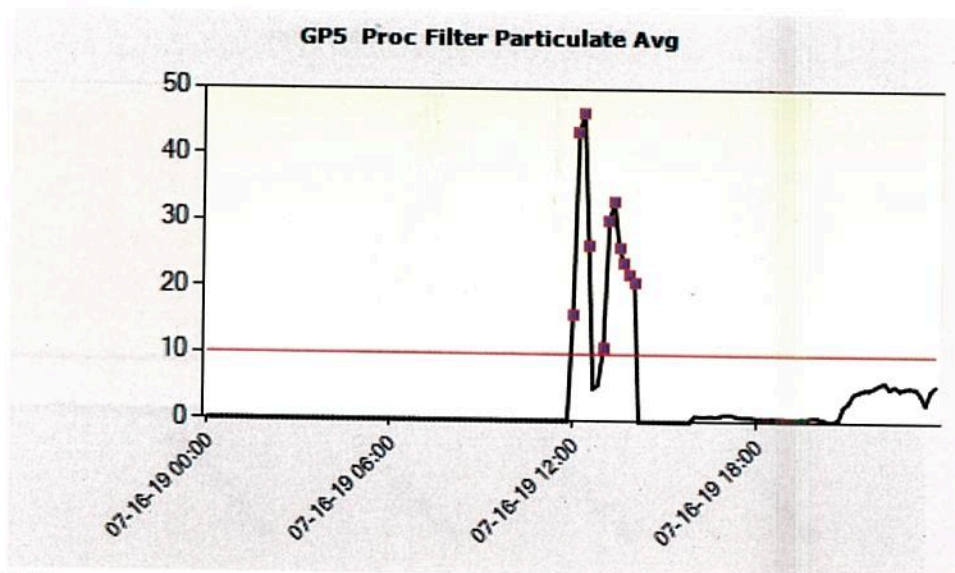
Unit: GP-5 MUF  
Date: July 14 5:50 PM- 10:00 PM  
Description: Heating up MUF



CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

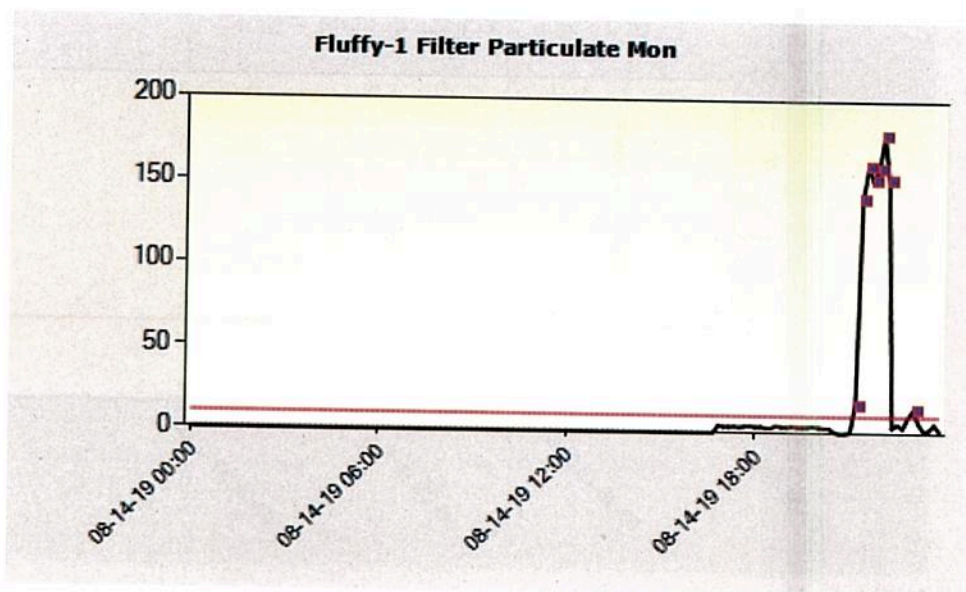
REPORTING PERIOD: July 1, 2019– December 31, 2019



Unit: GP-5 Process Filter

Date: July 16 12:00 PM- 2:10 PM

Description: Unit on heat load during exhaust valve maintenance



Unit: Fluffy-1 Filter

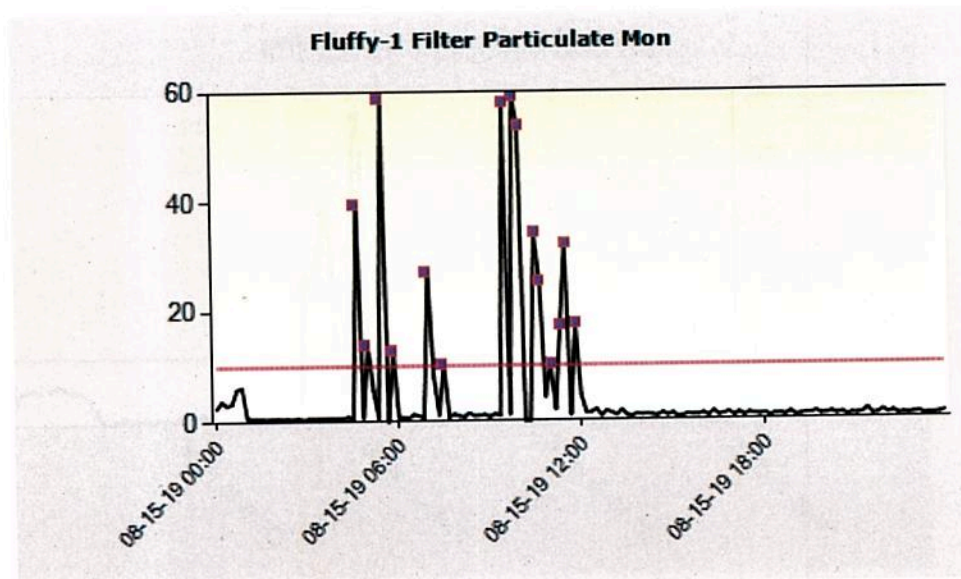
Date: August 14 11:00 PM- August 15 9:40 AM

Description: Excess moisture due to unit start up

CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

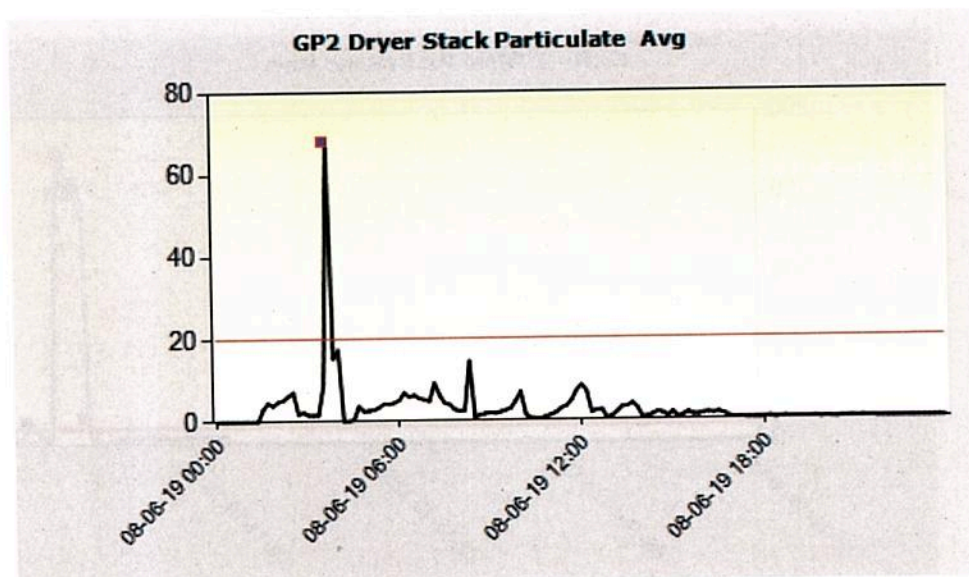
REPORTING PERIOD: July 1, 2019– December 31, 2019



Unit: Fluffy-1 Filter

Date: August 15 09:50 AM- 12:00 PM

Description: Sifting through bags on the process filter; bags were plugged and alarm cleared



Unit: GP-2 Dryer Stack

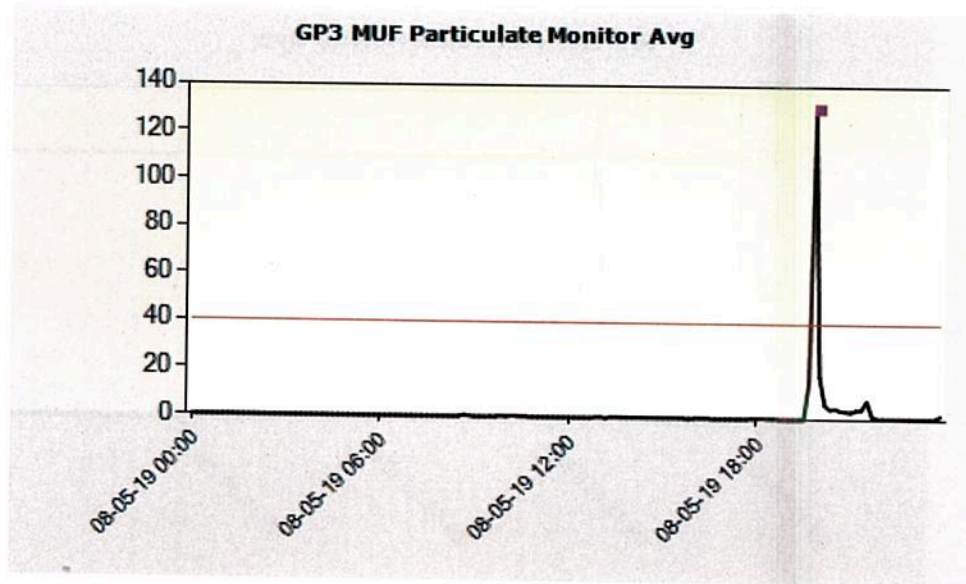
Date: August 6 3:40 AM-4:10 AM

Description: Dryers starting up on tail gas

CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

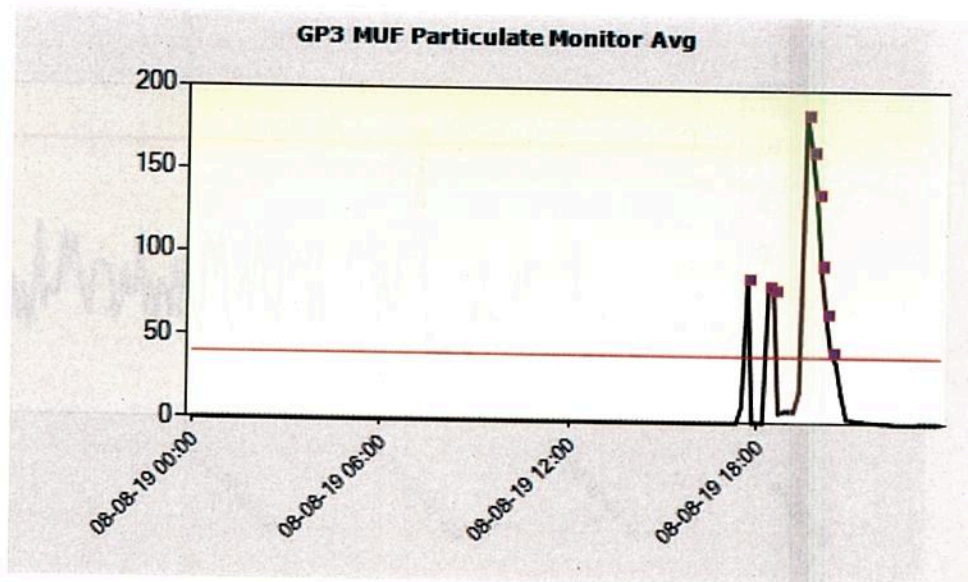
REPORTING PERIOD: July 1, 2019– December 31, 2019



Unit: GP-3 MUF

Date: August 5 7:50 PM- August 8 8:30 PM

Description: Unit on heat load, monitor cleaned



Unit: GP-3 MUF

Date: August 8 5:40 PM- 6:30 PM

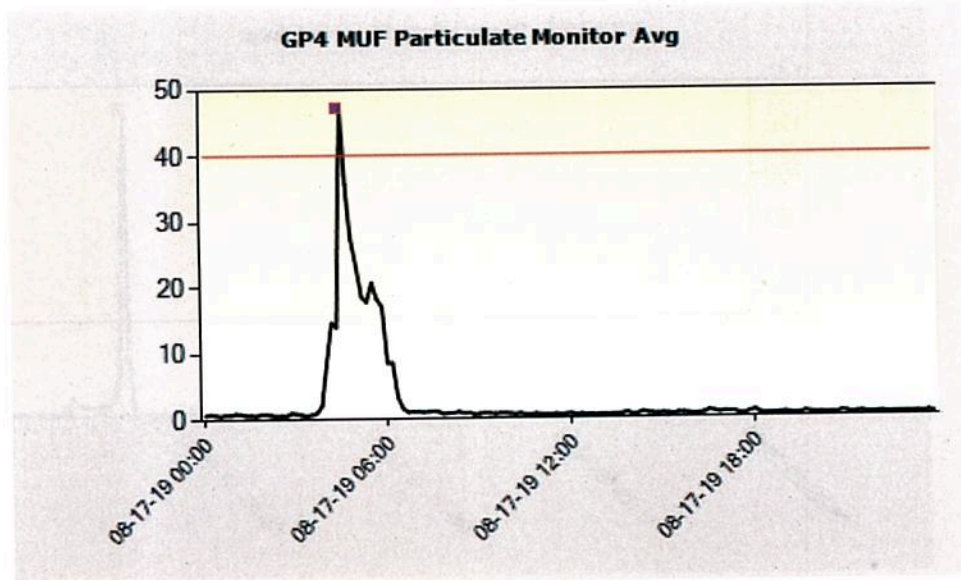
Description: Unit on heat load, monitor cleaned



CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

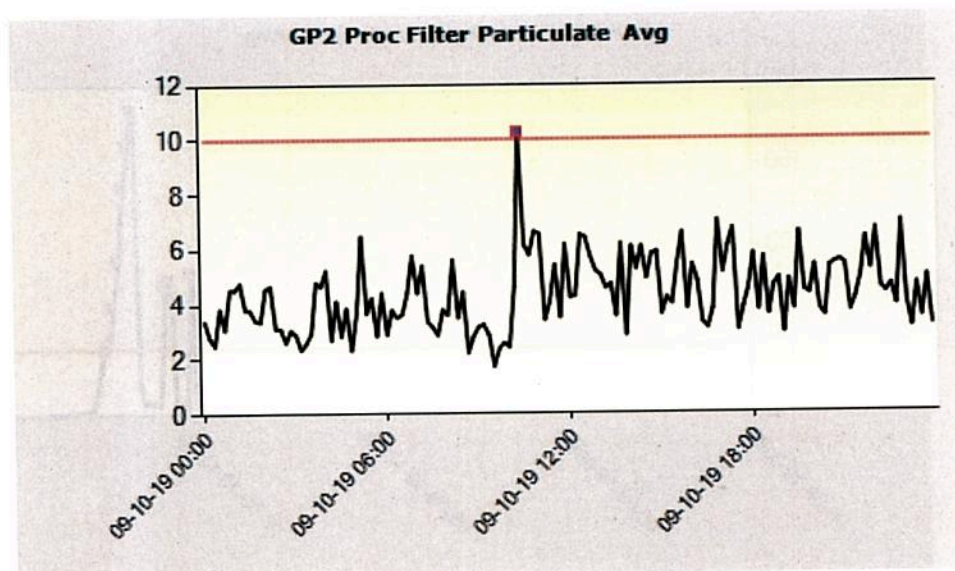
REPORTING PERIOD: July 1, 2019– December 31, 2019



Unit: GP-4 MUF

Date: August 17 4:30 AM- 4:40 AM

Description: Unit went down due to power failure



Unit: GP-2 Process Filter

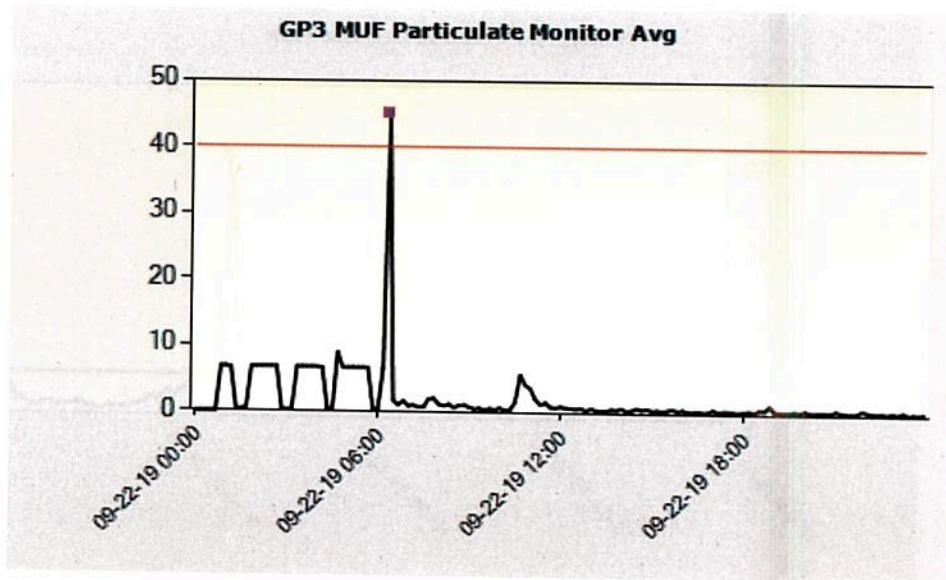
Date: September 10 10:20 AM- 10:30 AM

Description: Reprocessing material; alarm cleared after reprocessing stopped

CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

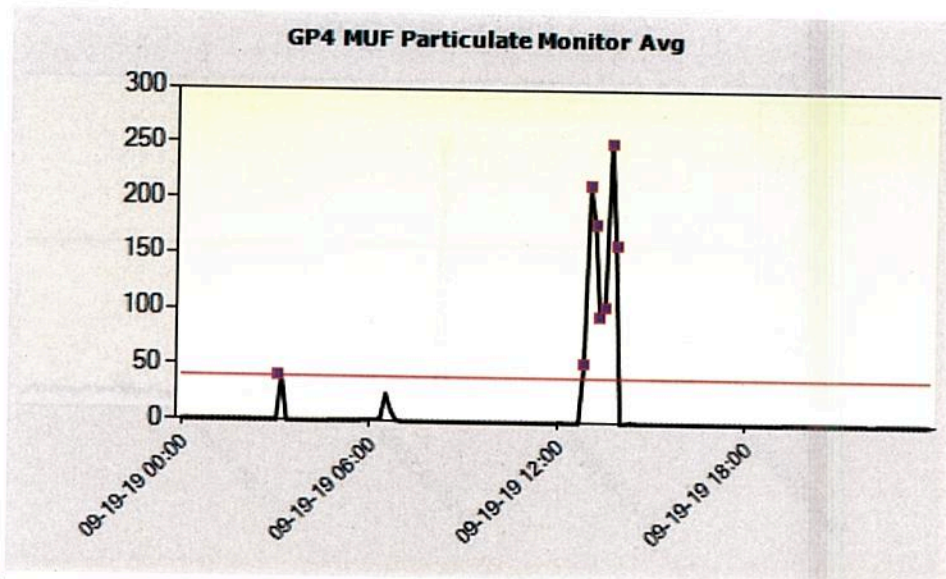
REPORTING PERIOD: **July 1, 2019– December 31, 2019**



Unit: GP-3 MUF

Date: September 22 6:20 AM- 6:30 AM

Description: Excessive moisture due to unit start up; monitor cleaned



Unit: GP-4 MUF

Date: September 19 3:10 AM- 3:20 AM

Description: Unit starting up on tris

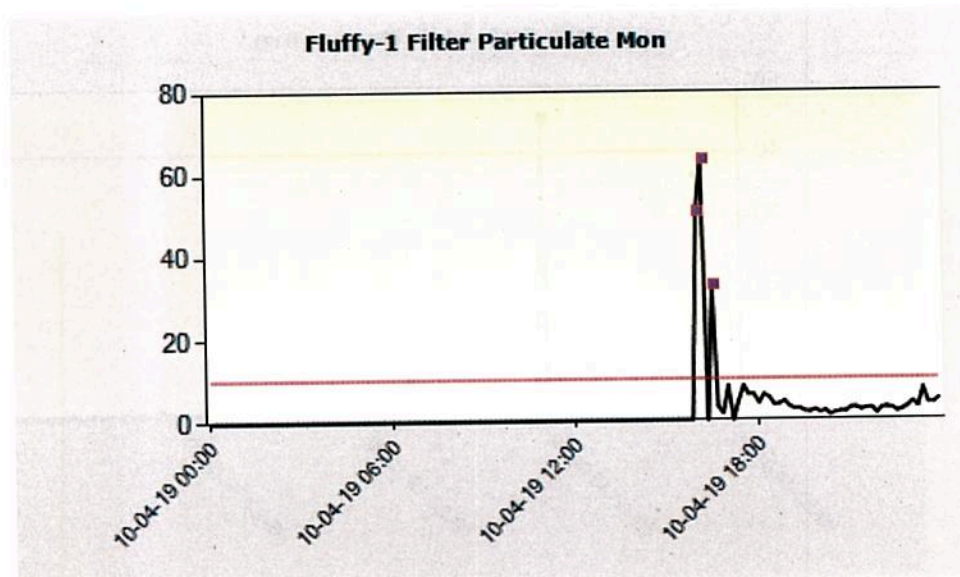
Date: September 19 12:50 PM-2:00 PM

Description: Unit on heat load

CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

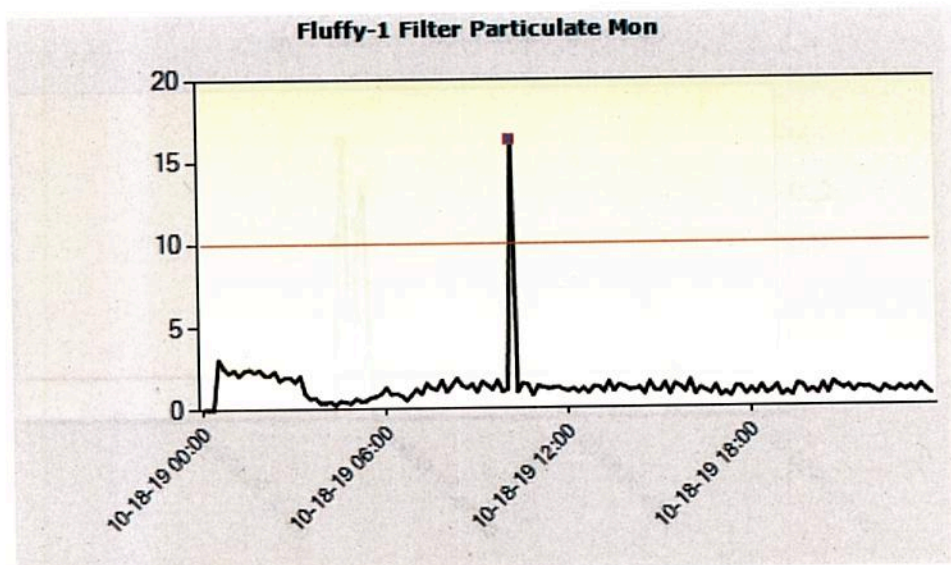
REPORTING PERIOD: July 1, 2019– December 31, 2019



Unit: Fluffy-1 Filter

Date: October 4 4:00 PM- October 5 7:40 AM

Description: Dirty PM monitor, maintenance called out to clean



Unit: Fluffy-1 Filter

Date: October 18 10:10 AM- 10:20 AM

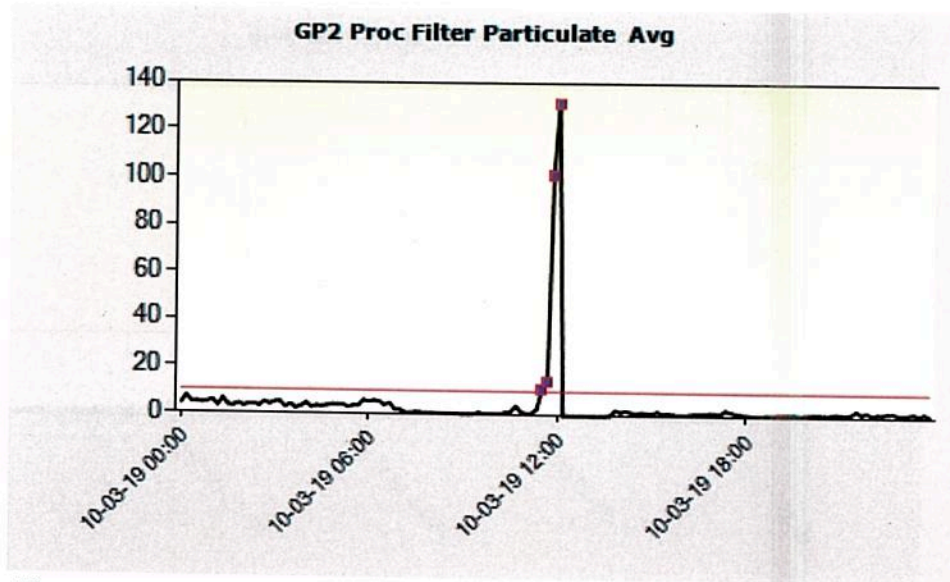
Description: Pulsaire had too much vacuum, when adjustments were made, black was dumped causing a spike in PM.



CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

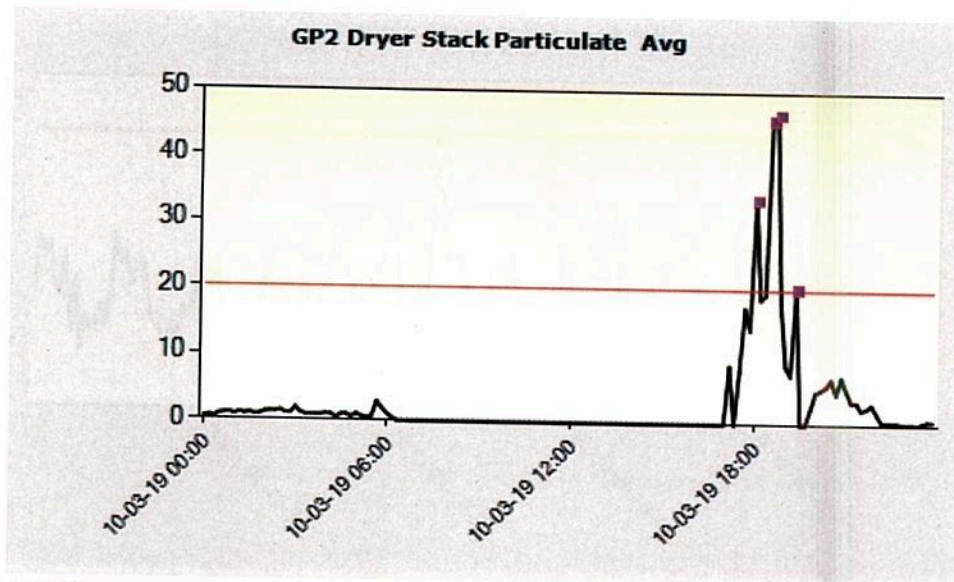
REPORTING PERIOD: July 1, 2019– December 31, 2019



Unit: GP-2 Process Filter

Date: October 3 11:30 AM- 12:10 PM

Description: Unit on heat load while investigating purge gas fan issues



Unit: GP-2 Dryer Stack

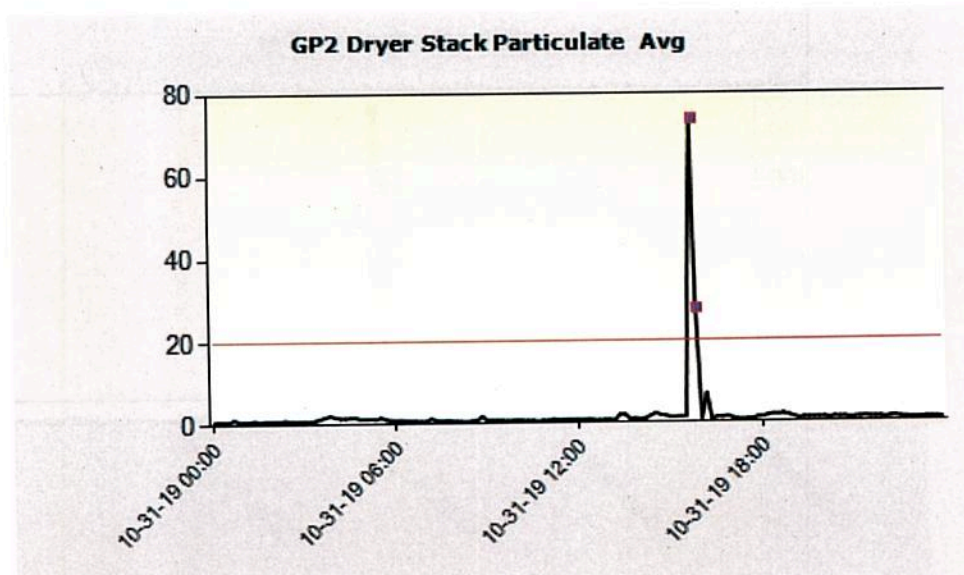
Date: October 3 6:00 PM- 7:30 PM

Description: Unit starting up

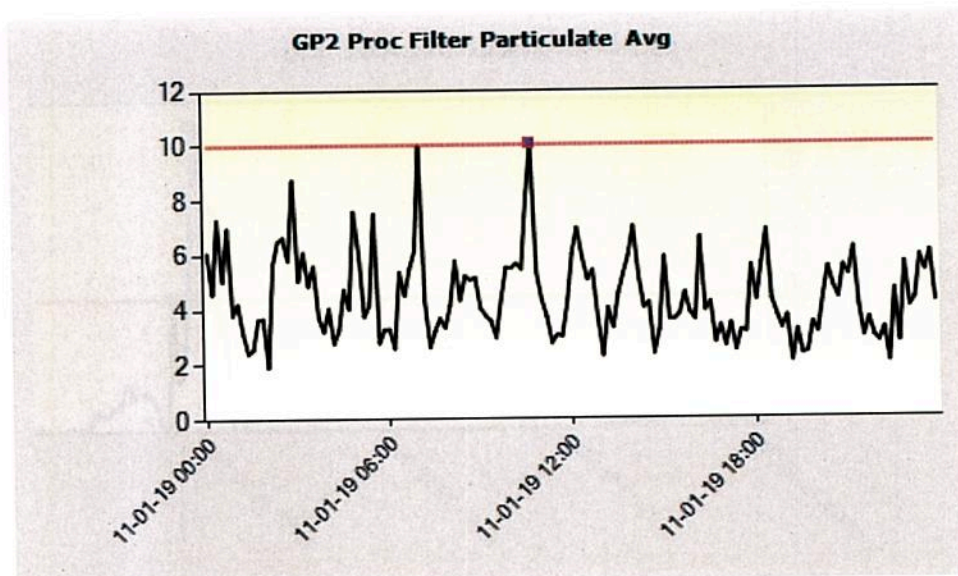
CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

PAMPA PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019



Unit: GP-2 Dryer Stack  
Date: October 31 3:40 PM- 4:00 PM  
Description: Unit start up

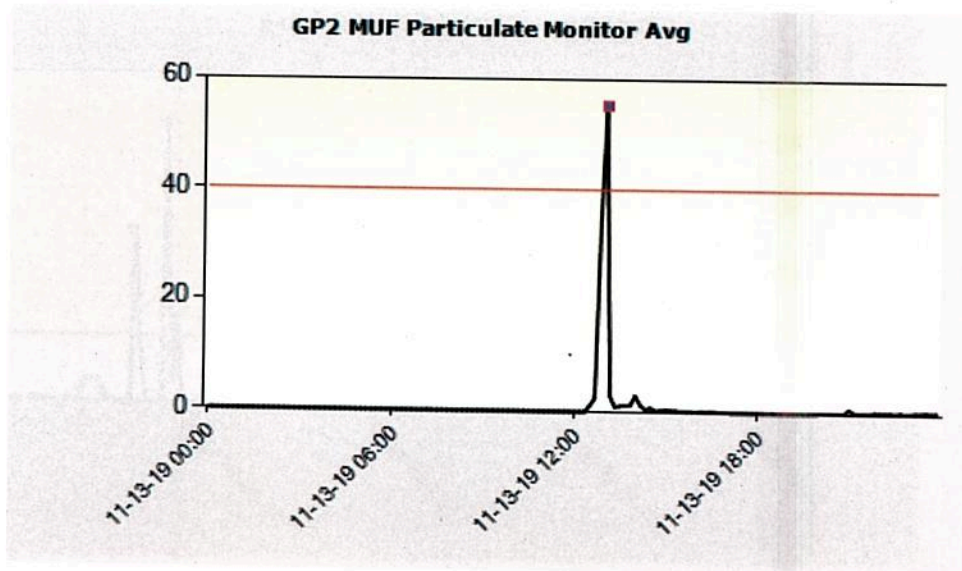


Unit: GP-2 Process Filter  
Date: November 1 10:40 AM- 10:40 AM  
Description: Unit down for turnaround

CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

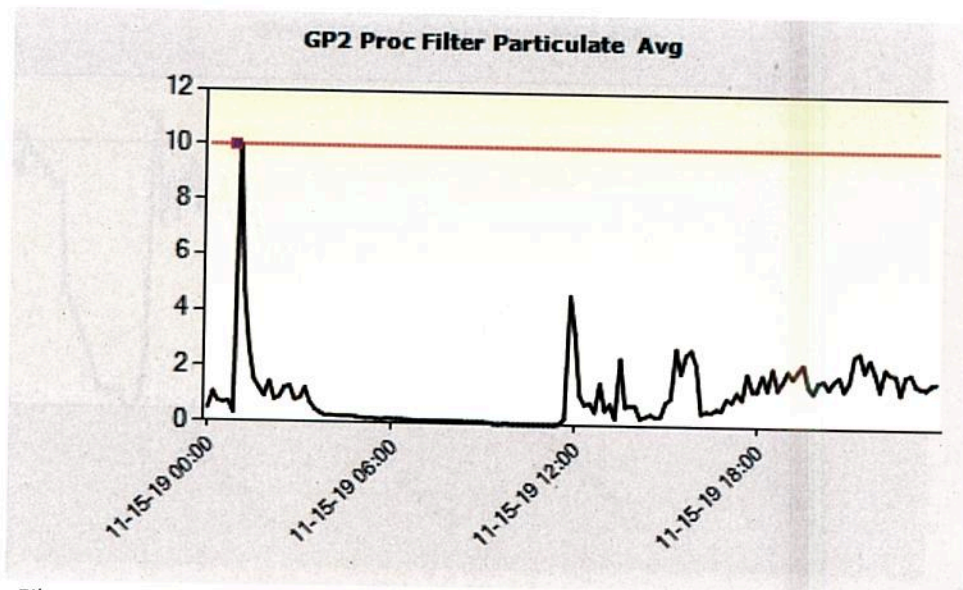
REPORTING PERIOD: **July 1, 2019– December 31, 2019**



Unit: GP-2 MUF

Date: November 13 1:00 PM- 10:10 PM

Description: Starting unit up after shutdown



Unit: GP-2 Process Filter

Date: November 15 1:00 AM-1:10 AM

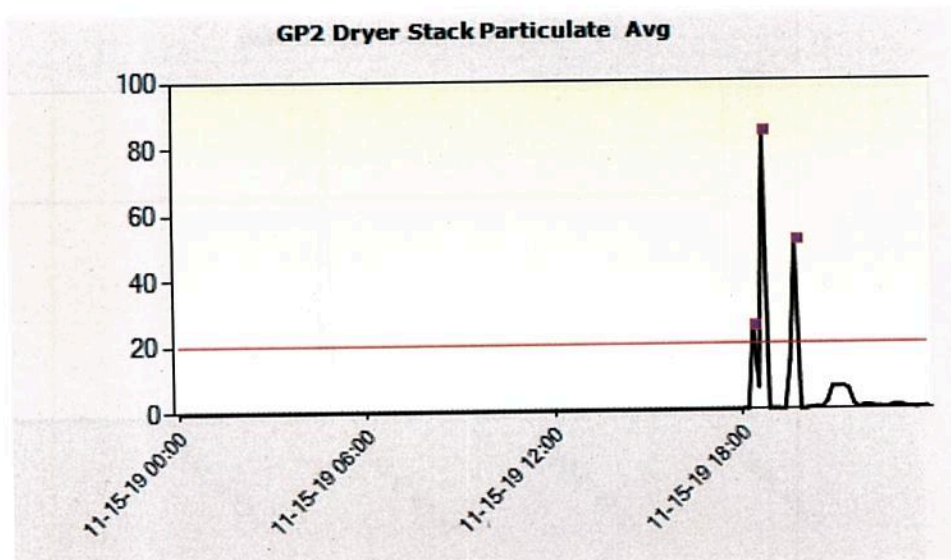
Description: Unit start up; Grinder plugged causing carbon black to back up into the process filter and pressurize. Alarm cleared when plug was removed.



CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

PAMPA PLANT

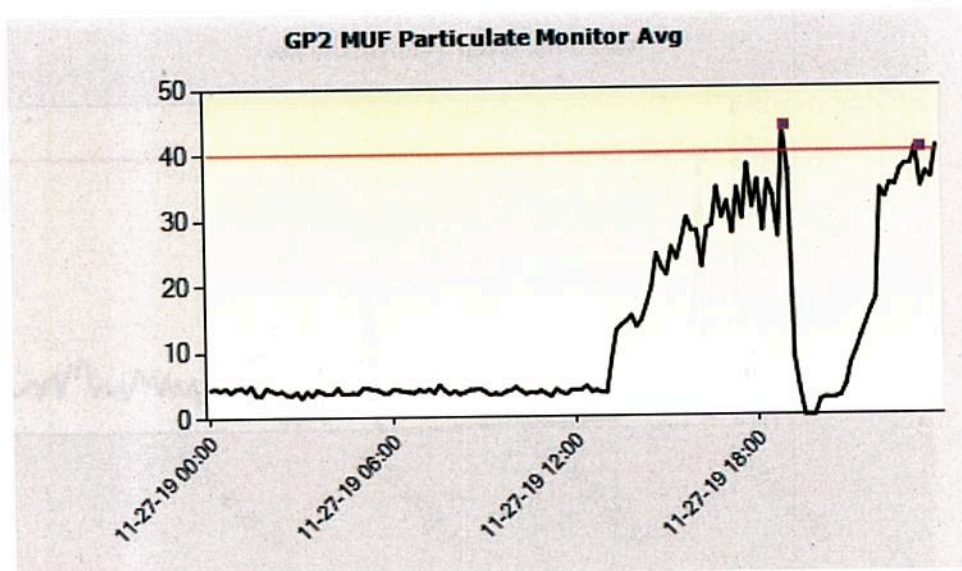
REPORTING PERIOD: July 1, 2019– December 31, 2019



Unit: GP-2 Dryer Stack

Date: November 15 6:20 PM- 7:50 PM

Description: Excessive moisture due to unit start up; monitor cleaned



Unit: GP-2 MUF

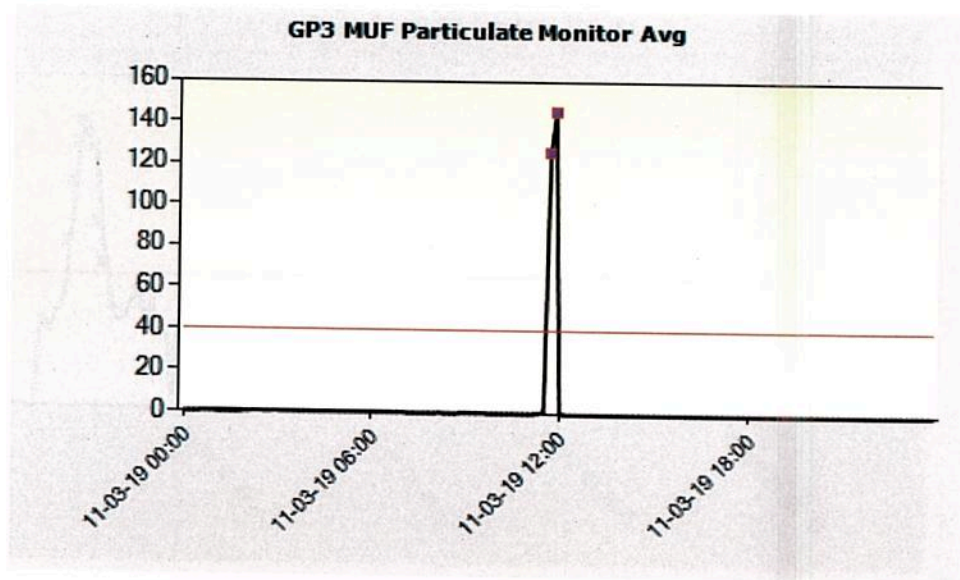
Date: November 27 6:50 PM- November 28 12:00 AM

Description: Excessive oil residue on monitor; reactor shut down; small bag leak in compartment 6

CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

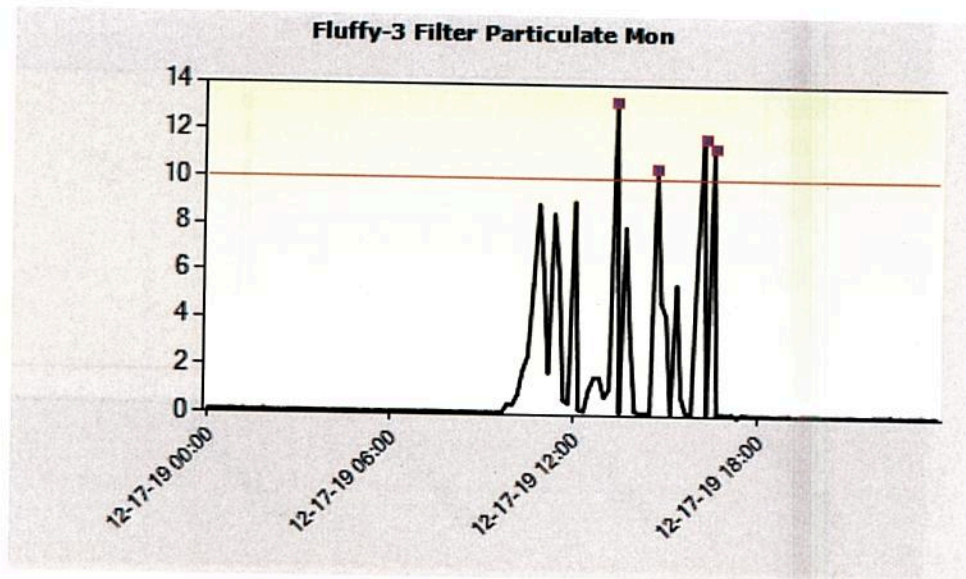
REPORTING PERIOD: July 1, 2019– December 31, 2019



Unit: GP3 MUF

Date: November 3 11:40 AM- 12:00 PM

Description: Unit shut down for turnaround



Unit: Fluffy-3 Filter

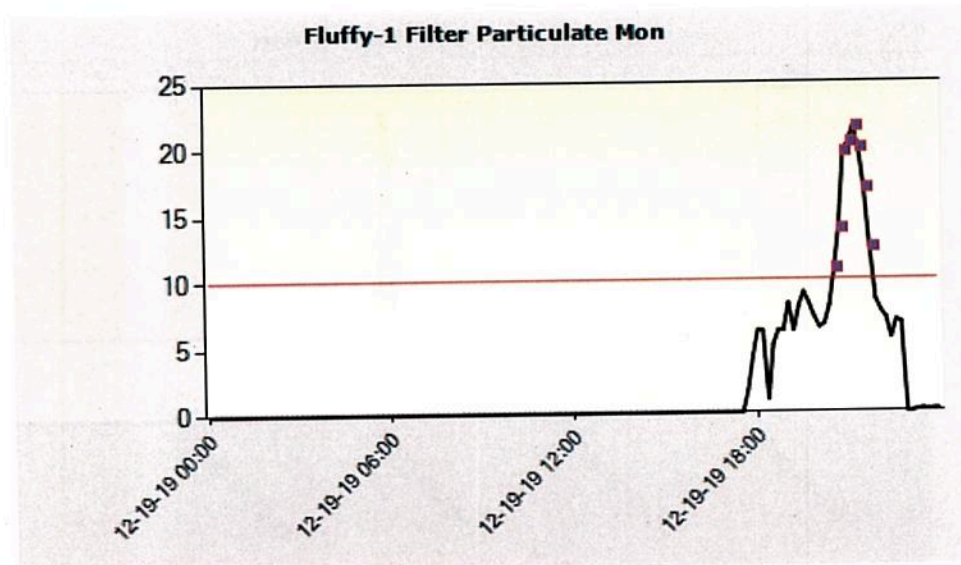
Date: December 17 1:20 PM-4:40 PM

Description: Dirty monitor; called maintenance to clean

CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

PAMPA PLANT

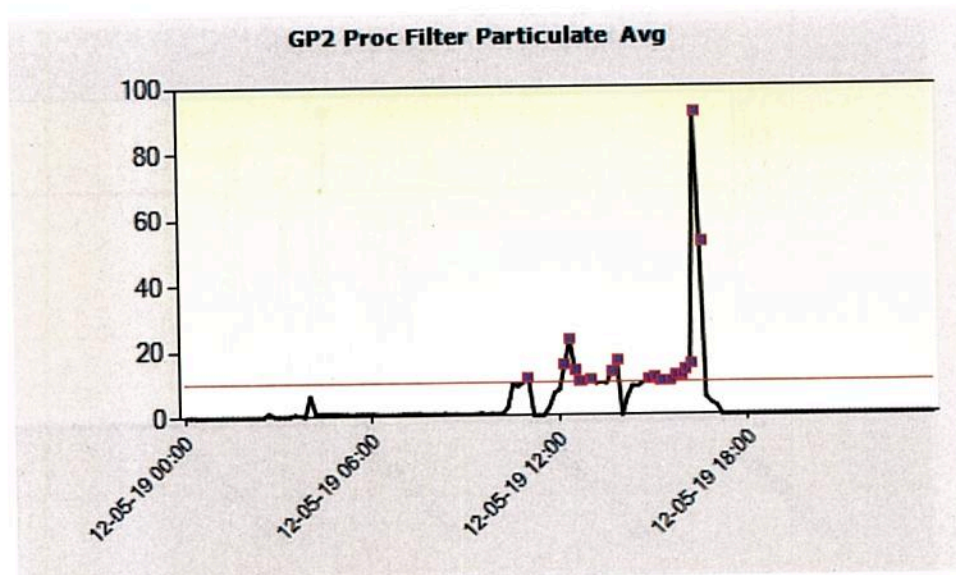
REPORTING PERIOD: July 1, 2019– December 31, 2019



Unit: Fluffy-1 Filter

Date: December 19 8:30 PM- 9:50 PM

Description: Excessive moisture while on heat load; alarms cleared once unit was back on make load



Unit: GP-2 Process Filter

Date: December 5 11:00 AM-4:40 PM

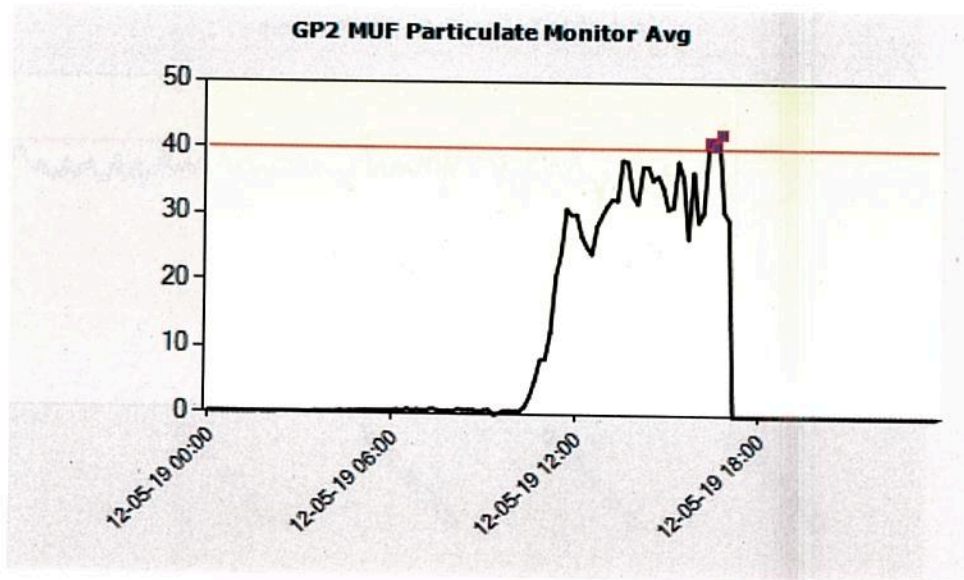
Description: Operator found and plugged two leaking bags



CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

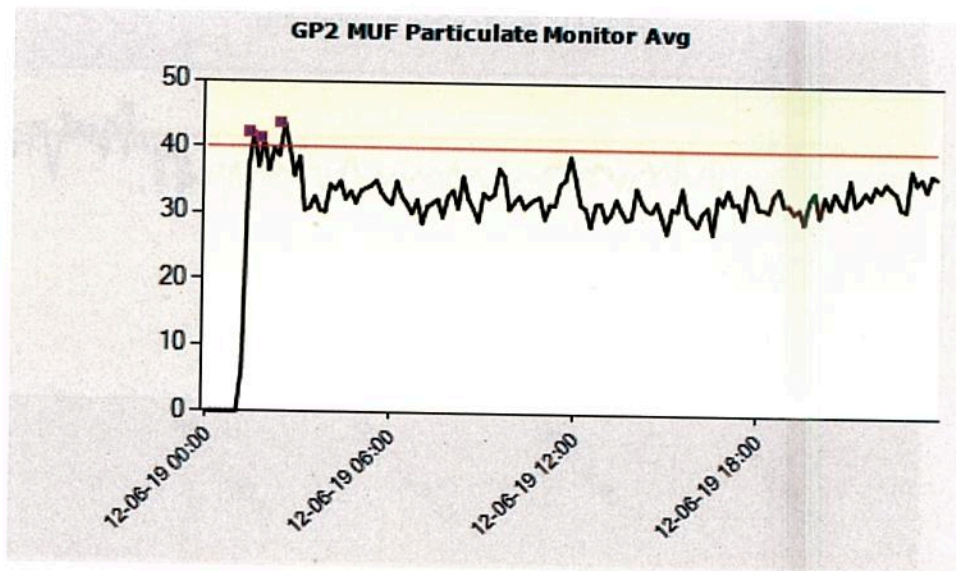
REPORTING PERIOD: **July 1, 2019– December 31, 2019**



Unit: GP-2 MUF

Date: December 5 4:20 PM-4:50 PM

Description: Oil build up was discovered on monitor; monitor was placed in maintenance mode until cleaned



Unit: GP-2 MUF

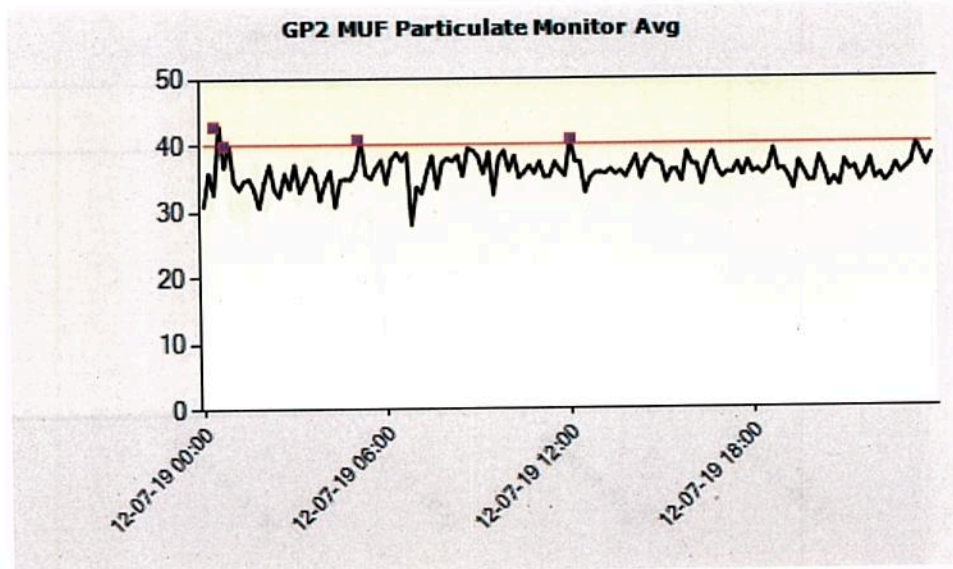
Date: December 6 1:30 AM- 2:40 AM

Description: Oil build up was discovered on monitor; monitor was placed in maintenance mode until cleaned

CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

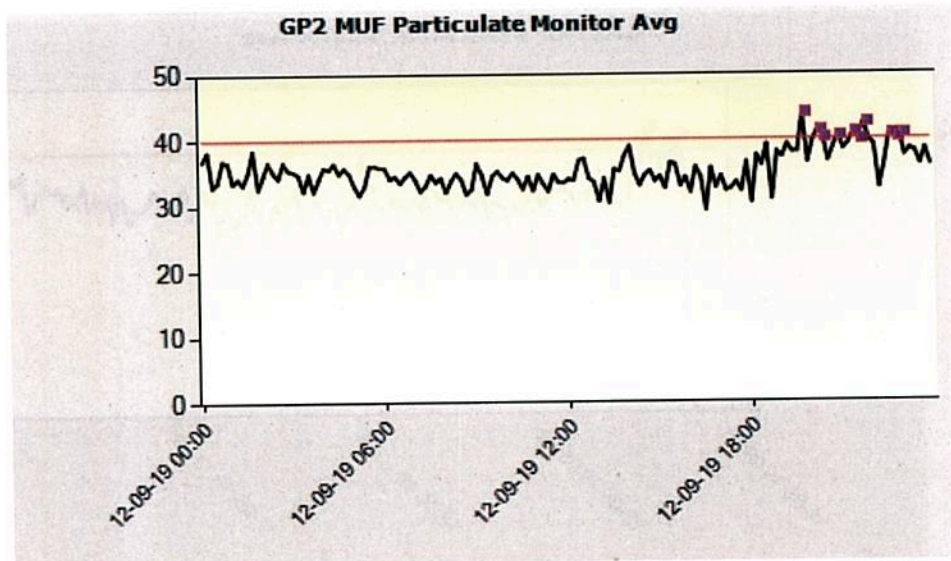
REPORTING PERIOD: **July 1, 2019– December 31, 2019**



Unit: GP-2 MUF

Date: December 7 12:30 AM- 1:00 AM ; December 7 5:10 AM- December 8 1:20 AM

Description: Reactor 8 put on heat load; maintenance called to inspect bags



Unit: GP-2 MUF

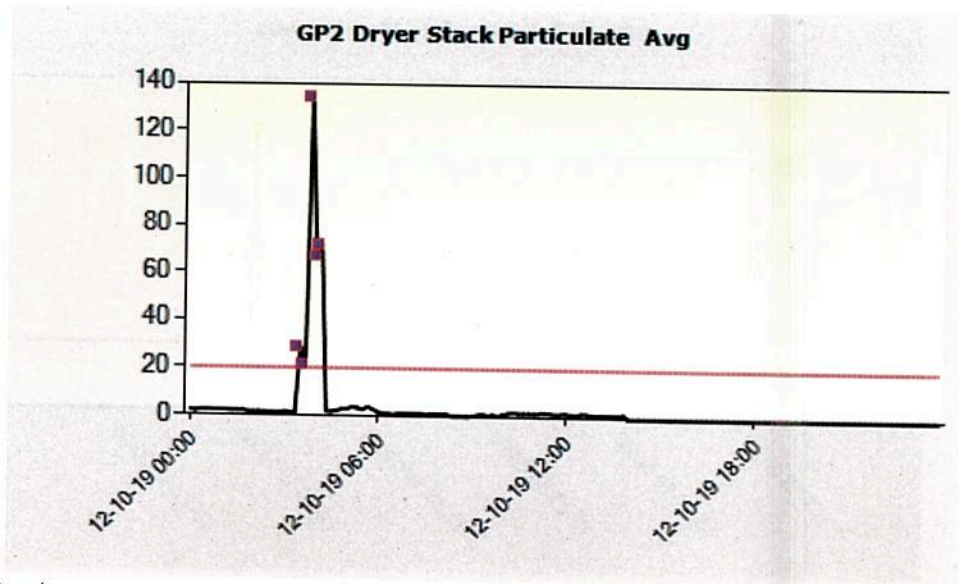
Date: December 9 7:40 PM- 1:40 AM

Description: Air purge at monitor attempts failed; took one reactor to heat load to assist with PM alarm; unit taken to heat load then shut down for MUF repairs

CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

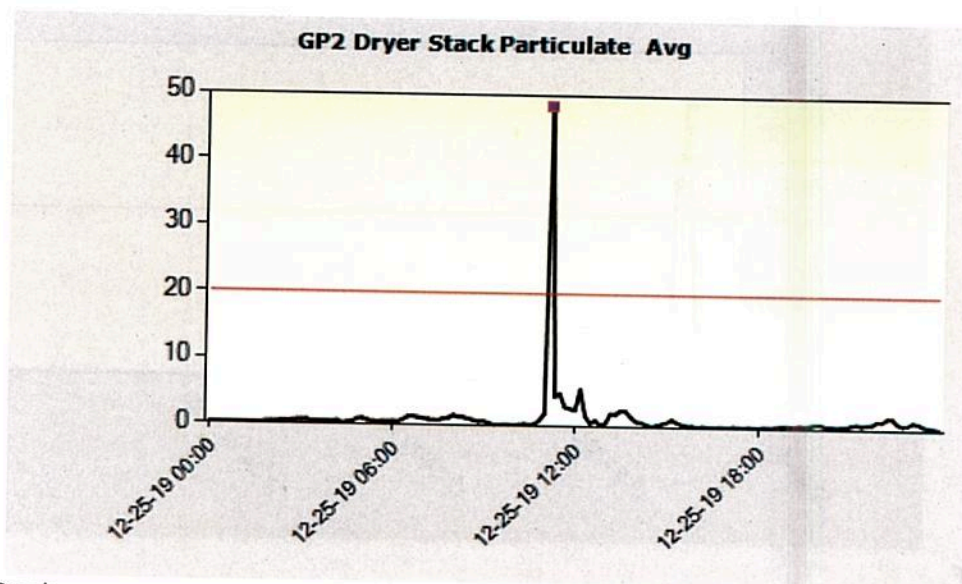
REPORTING PERIOD: July 1, 2019– December 31, 2019



Unit: GP-2 Dryer Stack

Date: December 10 3:30 AM- 4:20 AM

Description: Moisture on particulate monitor from startup



Unit: GP-2 Dryer Stack

Date: December 25 11:10 AM- 11:20 AM

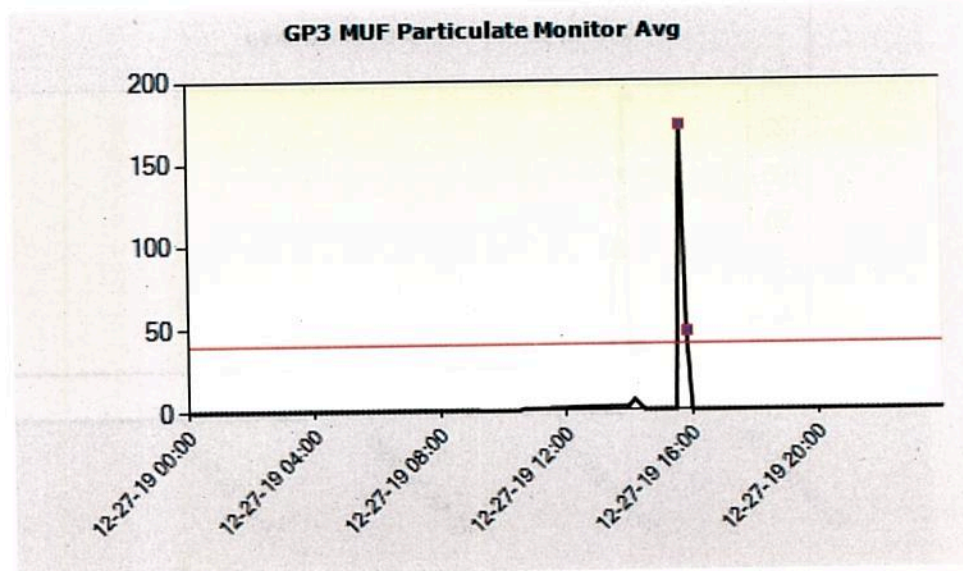
Description: Dirty monitor; alarm cleared when cleaned



CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**PAMPA PLANT**

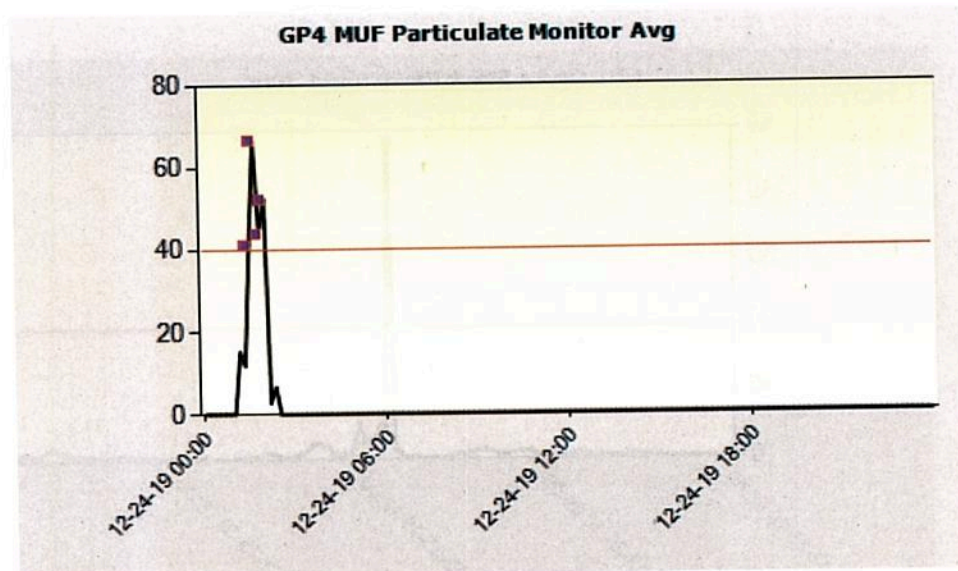
REPORTING PERIOD: July 1, 2019– December 31, 2019



Unit: GP-3 MUF

Date: December 27 3:40 PM- 4:00 PM

Description: Unit on heat load in MUF; maintenance cleaned when ready to load



Unit: GP-4 MUF

Date: December 24 1:00 AM- December 27 6:10 AM

Description: Unit taken down cold; monitor cleaned before loading unit back up

**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**PAMPA PLANT**

**REPORTING PERIOD:** July 1, 2019– December 31, 2019

**ATTACHMENT 3**

**EXPLANATION OF PERIODS OF PM EARLY WARNING SYSTEM DOWNTIME**

**CABOT CORPORATION**  
**USEPA-LDEQ-CABOT CONSENT DECREE**  
**SEMIANNUAL COMPLIANCE REPORT**

**PAMPA PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

**PMEWS Data Availability Detail: 01-Jul-2019 to 31-Dec-2019**



Unit	Source	Start Time	End Time	Duration Hours	Alarm Type	Status Code	Status Description	Consent Decree
GP-0	Process Filter Dry Drum	30-Oct-2019 10:32	30-Oct-2019 10:32	0.02	General	16	No Response From Sensor	Y
GP-0	Process Filter Dry Drum	26-Nov-2019 10:38	26-Nov-2019 10:39	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-0	Process Filter Dry Drum	01-Dec-2019 03:27	01-Dec-2019 03:36	0.15	General	16	No Response From Sensor	Y
GP-0	Process Filter Dry Drum	01-Dec-2019 04:52	01-Dec-2019 05:01	0.15	General	16	No Response From Sensor	Y
GP-0	Process Filter Dry Drum	01-Dec-2019 05:11	01-Dec-2019 11:01	5.83	General	256	Error Code->256	Y
GP-0	Process Filter Dry Drum	27-Dec-2019 13:58	27-Dec-2019 13:59	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
GP-0	Process Filter Fluffy-1	04-Aug-2019 14:34	04-Aug-2019 18:48	4.25	SelfTest	64	Clean Probe (Contam Ring Fault)	Y
GP-0	Process Filter Fluffy-1	13-Aug-2019 16:12	13-Aug-2019 19:10	2.98	SelfTest	64	Clean Probe (Contam Ring Fault)	Y
GP-0	Process Filter Fluffy-1	14-Aug-2019 16:46	14-Aug-2019 21:39	4.90	SelfTest	64	Clean Probe (Contam Ring Fault)	Y
GP-0	Process Filter Fluffy-1	14-Aug-2019 22:17	14-Aug-2019 22:33	0.28	General	16	No Response From Sensor	Y
GP-0	Process Filter Fluffy-1	26-Nov-2019 10:38	26-Nov-2019 10:39	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-0	Process Filter Fluffy-1	01-Dec-2019 03:27	01-Dec-2019 03:43	0.27	General	16	No Response From Sensor	Y
GP-0	Process Filter Fluffy-1	01-Dec-2019 03:46	01-Dec-2019 10:49	7.05	General	14565	Error Code->14565	Y
GP-0	Process Filter Fluffy-1	01-Dec-2019 10:49	01-Dec-2019 11:01	0.20	SelfTest	5120	Error Code->5120	Y
GP-0	Process Filter Fluffy-1	27-Dec-2019 13:58	27-Dec-2019 13:59	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
GP-0	Process Filter Fluffy-3	30-Oct-2019 10:32	30-Oct-2019 10:32	0.02	General	16	No Response From Sensor	Y
GP-2	Dryer	26-Nov-2019 10:38	26-Nov-2019 10:39	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-2	Dryer	01-Dec-2019 03:27	01-Dec-2019 10:49	7.37	General	16	No Response From Sensor	Y
GP-2	MUF	26-Nov-2019 10:38	26-Nov-2019 10:39	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-2	MUF	01-Dec-2019 03:27	01-Dec-2019 10:49	7.37	General	30721	Error Code->30721	Y
GP-2	MUF	01-Dec-2019 10:49	01-Dec-2019 11:01	0.20	SelfTest	12544	Error Code->12544	Y
GP-2	MUF	27-Dec-2019 13:58	27-Dec-2019 13:59	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
GP-2	Process Filter	26-Nov-2019 10:38	26-Nov-2019 10:39	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-2	Process Filter	01-Dec-2019 03:27	01-Dec-2019 10:49	7.37	General	16	No Response From Sensor	Y
GP-2	Process Filter	27-Dec-2019 13:58	27-Dec-2019 13:59	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
GP-3	MUF	26-Nov-2019 10:38	26-Nov-2019 10:39	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-3	MUF	01-Dec-2019 03:27	01-Dec-2019 03:36	0.15	General	16	No Response From Sensor	Y
GP-3	MUF	01-Dec-2019 04:52	01-Dec-2019 05:01	0.15	General	16	No Response From Sensor	Y
GP-3	MUF	01-Dec-2019 05:11	01-Dec-2019 10:49	5.63	General	16	No Response From Sensor	Y
GP-3	MUF	01-Dec-2019 11:00	01-Dec-2019 11:01	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y



**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**PAMPA PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

GP-3	MUF	27-Dec-2019 13:58	27-Dec-2019 13:59	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
GP-3	MUF	27-Dec-2019 15:05	27-Dec-2019 16:36	1.52	SelfTest	16384	Sensor in Maintenance Mode	Y
GP-4	MUF	26-Nov-2019 10:38	26-Nov-2019 10:39	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
GP-4	MUF	01-Dec-2019 03:27	01-Dec-2019 03:43	0.27	General	16	No Response From Sensor	Y
GP-4	MUF	01-Dec-2019 03:46	01-Dec-2019 10:49	7.05	General	16	No Response From Sensor	Y
GP-4	MUF	01-Dec-2019 11:00	01-Dec-2019 11:01	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
GP-4	MUF	27-Dec-2019 13:58	27-Dec-2019 13:59	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
GP-5	MUF	16-Sep-2019 14:14	16-Sep-2019 14:14	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 16:25	19-Sep-2019 16:25	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 16:39	19-Sep-2019 16:39	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 16:50	19-Sep-2019 16:50	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 16:53	19-Sep-2019 16:53	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 16:55	19-Sep-2019 16:55	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 17:12	19-Sep-2019 17:13	0.03	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 17:22	19-Sep-2019 17:23	0.03	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 17:27	19-Sep-2019 17:27	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 17:29	19-Sep-2019 17:29	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 17:31	19-Sep-2019 17:31	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 17:35	19-Sep-2019 17:38	0.07	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 17:40	19-Sep-2019 17:40	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 17:42	19-Sep-2019 17:42	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 17:44	19-Sep-2019 17:44	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 17:49	19-Sep-2019 17:49	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 17:51	19-Sep-2019 17:51	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 17:53	19-Sep-2019 17:53	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 17:58	19-Sep-2019 18:03	0.10	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 18:06	19-Sep-2019 18:06	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 18:11	19-Sep-2019 18:11	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 18:16	19-Sep-2019 18:18	0.05	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 18:21	19-Sep-2019 18:22	0.03	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 18:24	19-Sep-2019 18:24	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 18:29	19-Sep-2019 18:29	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 18:32	19-Sep-2019 18:34	0.05	General	16	No Response From Sensor	Y
GP-5	MUF	19-Sep-2019 18:36	19-Sep-2019 18:37	0.03	General	16	No Response From Sensor	Y

**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**PAMPA PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

GP-5	MUF	20-Sep-2019 14:09	20-Sep-2019 14:10	0.03	General	16	No Response From Sensor	Y
GP-5	MUF	20-Sep-2019 14:12	20-Sep-2019 14:12	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	20-Sep-2019 14:15	20-Sep-2019 14:16	0.03	General	16	No Response From Sensor	Y
GP-5	MUF	20-Sep-2019 14:18	20-Sep-2019 14:20	0.05	General	16	No Response From Sensor	Y
GP-5	MUF	20-Sep-2019 14:22	20-Sep-2019 14:23	0.03	General	16	No Response From Sensor	Y
GP-5	MUF	20-Sep-2019 14:28	20-Sep-2019 14:28	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	20-Sep-2019 14:31	20-Sep-2019 14:36	0.10	General	16	No Response From Sensor	Y
GP-5	MUF	20-Sep-2019 14:38	20-Sep-2019 14:38	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	20-Sep-2019 14:51	20-Sep-2019 14:51	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	20-Sep-2019 14:56	20-Sep-2019 14:56	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	25-Sep-2019 08:36	25-Sep-2019 08:36	0.02	General	16	No Response From Sensor	Y
GP-5	MUF	27-Dec-2019 13:58	27-Dec-2019 13:59	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
GP-5	Process Filter	27-Dec-2019 13:58	27-Dec-2019 13:59	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
GP-9	Process Filter	26-Nov-2019 10:38	26-Nov-2019 10:39	0.01	Aspen	2	Comm Error - No Data in 15 min	N
GP-9	Process Filter	01-Dec-2019 03:27	01-Dec-2019 09:15	5.80	General	16	No Response From Sensor	N

CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

**a. A description of the construction of the Control Technologies, CEMS, and PM Early Warning Systems required by this Consent Decree, including:**

- i. *If construction is not underway, any available information concerning the construction schedule and the execution of major contracts.*

All construction activities have begun. See details below.

- ii. *If construction is underway, the estimated percent of installation as of the end of the reporting period, the current estimated construction completion date, and a brief description of completion of significant milestones during the reporting period.*

Construction efforts began in September 2016 and have continued through December 2019. Construction scope of work efforts completed in this period include:

- FRP absorber tank and tower system construction for the AQCS system (SO<sub>x</sub> removal) is 95% complete with additional equipment installation still required to complete the total AQCS system (25% complete).
- Major equipment installation from existing incinerator to AQCS unit is 95% complete.
- The HRSG/SCR equipment that is integral to the HRSG have been installed. Piping, electrical and controls work are 95% complete.
- Ducting from incinerator to HRSG and HRSG to AQCS system has been installed, but are not in operation. Refractory has been installed.
- Consistent with the provisions of the Consent Decree, CEMS equipment systems have been completed and FAT tested, currently residing in an offsite storage facility until required.

The anticipated project schedule for construction activity, including execution of major contracts, is as follows for the Control Systems and CEMS:

- Equipment fabrication – 6/2016 through 2/2018
- Detailed Engineering – Complete
- Phase I Construction – Complete
- Phase II Construction – 10/2019 through 1/2021
- Start - up / Commissioning – 1/2021 through 3/2021
- Compliance – 4 /1/2021

Cabot has executed contracts for the major equipment since December 2015 and has received 100% of all purchased equipment on-site. This includes CEMS and control equipment fabrication packages which were received in October 2017.

Cabot has entered into an agreement with an energy partner, CLECO, who has built and installed a heat recovery steam generator and electricity generator system in conjunction with Cabot's Consent Decree compliance project.



CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: **July 1, 2019– December 31, 2019**

- iii. *Any information indicating that installation and commencement of operation may be delayed, including the nature and cause of the delay.*

Based upon the best information currently available, Cabot has not identified any basis to anticipate any delay in satisfying the installation and construction schedules established under the Consent Decree.

- iv. *Once construction is complete, provide the dates the equipment was placed in service and/or commenced Continuous Operation and the dates of any testing that was performed during the period.*

Consistent with the provisions of the Second Amendment of the Consent Decree, construction activity for the control equipment was not completed during the relevant reporting period.

In satisfaction of the relevant terms of the Consent Decree, Cabot installed the equipment associated with the PM Early Warning Systems (PMEWS), established alarm set points, and commenced continuous operation of the system as of the Effective Date of the Consent Decree. The Consent Decree establishes no testing requirements for the system during the reporting period.

- b. ***All information necessary to demonstrate compliance with all applicable Emissions Limits, 30-day Rolling Average Sulfur Content Weight Percent, 365-day Rolling Average Sulfur Content Weight Percent, and other provisions in Sections VI (SO<sub>2</sub> Control Technology, Emissions Limits, and Monitoring Requirements), VII (NO<sub>x</sub> Control Technology, Emissions Limits, and Monitoring Requirements) and VIII (PM Control Technology, Emissions Limits, Best Management Practices, and Early Warning System Requirements)***

- *Paragraph 17 - SO<sub>2</sub> Process System Operation, Emissions Limits and Control Technology*

Pursuant to the terms of the Consent Decree and the Second Amendment, Cabot was not required during the relevant reporting period to demonstrate compliance with any applicable emissions limit, or other provision in Sections VI (SO<sub>2</sub> Control Technology, Emissions Limits, and Monitoring Requirements), VII (NO<sub>x</sub> Control Technology, Emissions Limits, and Monitoring Requirements) and VIII (PM Control Technology, Emissions Limits, Best Management Practices, and Early Warning System Requirements) under the Consent Decree, except as specifically addressed herein.

- *Paragraph 18 - WGS Design Specifications*

Pursuant to the terms of the Consent Decree, Cabot submitted the WGS Design Specifications to the EPA on September 10, 2015 and provided follow-up information on November 10, 2015.

- *Paragraph 19 - SO<sub>2</sub> Alternative Equivalent Pollution Control Technology*

Pursuant to the terms of the Consent Decree, Cabot has not requested an Alternative Equivalent Pollution Control Technology for SO<sub>2</sub>.

- *Paragraph 20 - SO<sub>2</sub> Monitoring Requirements*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until April 1, 2021.

- *Paragraph 23 - NO<sub>x</sub> Emissions Limits Applicable to Heat Load Operation, Startup, and Shutdown*

CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until April 1, 2021.

- *Paragraph 24 - Heat Load Operation, Startup, and Shutdown Compliance Calculation*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until April 1, 2021.

- *Paragraph 25 - Alternative Heat Load Operation, Startup, and Compliance Calculation*

Pursuant to the terms of the Consent Decree, Cabot has not requested an Alternative Heat Load Operation, Startup, and Compliance Calculation for NO<sub>x</sub>.

- *Paragraph 26 - NO<sub>x</sub> Process System Operation Emissions Limits and Control Technology SCR Design Specifications*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until April 1, 2021.

- *Paragraph 27 - SCR Design Specifications*

Pursuant to the terms of the Consent Decree, Cabot submitted the WGS Design Specifications to the EPA on September 10, 2015 and provided follow-up information on November 10, 2015.

- *Paragraph 28 - NO<sub>x</sub> Alternative Equivalent Pollution Control Technology*

Pursuant to the terms of the Consent Decree, Cabot has not requested an Alternative Equivalent Pollution Control Technology for NO<sub>x</sub>.

- *Paragraph 29 - NO<sub>x</sub> Monitoring Requirements*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until April 1, 2021.

- *Paragraph 30 - PM Control Technology and Emissions Limits*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until 180 days after April 1, 2021, or September 29, 2021.

- *Paragraph 31 - PM Stack Testing*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required to begin until 180 days after April 1, 2021, or September 29, 2021.

- *Paragraph 32 and Appendix B - Other PM Control Requirements*



**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**CANAL PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

During the reporting period, Cabot achieved and maintained compliance with the requirements of Paragraph 32 and Appendix B the Consent Decree relative to particulate matter ("PM") control requirements. More specifically, for each PM emissions equipment unit:

- Cabot employed the required PM Reduction Mechanism and Method for Managing PM Emissions specified in Appendix B of the Consent Decree.
- Cabot completed the relevant daily visual assessments and maintained a record of the results of each such assessment.
- Cabot developed and maintained a record of the results of each of the required daily visual assessments and associated Method 9 observations, when applicable.
- *Paragraph 33 and Appendix C - Particulate Emissions Best Management Practices Control Plan*  
  
Cabot implemented the Particulate Emissions Best Management Practices Control Plan set forth in Appendix C of the Consent Decree, to the extent required during the reporting period.
- *Paragraph 34 and Appendix D - PM Early Warning System*

Cabot maintained compliance with applicable requirements of the Consent Decree related to the PM Early Warning System throughout the reporting period. During the reporting period, Cabot operated each PM Early Warning System at all times of Heat Load Operation and Process System Operation, except during system breakdowns, repairs, maintenance, calibration checks, and zero and span adjustments of the applicable system.

During the reporting period, Cabot achieved a data availability of greater than 95% based on a quarterly average of the operating time of the emission unit or activity being monitored, and therefore, achieved full compliance with the minimum degree of availability requirements of the Consent Decree.

In addition, in response to any alarm triggered during the reporting period for any PM Early Warning System at the facility, Cabot investigated the cause of the alarm as expeditiously as practicable and performed the required sequence of tasks to respond to the alarm.

On each Operating Day in this reporting period, Cabot conducted a visual review of the recorded data for each PM Early Warning System to identify trends in relative PM emissions.

Cabot also conducted routine maintenance during the reporting period in accordance with manufacturer's recommendations as addressed within the provisions in Paragraphs D.8a and D.8b of the Consent Decree.

- d. *All CEMS data collected for each Process System, from the time any Emissions Limit in Sections VI (SO<sub>2</sub> Control Technology, Emissions Limits, and Monitoring Requirements) and VII (NO<sub>x</sub> Control Technology, Emissions Limits, and Monitoring Requirements) is exceeded until compliance is achieved, and an explanation of any periods of downtime of such CEMS.*

- *Paragraph 20 - SO<sub>2</sub> Monitoring Requirements*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these



CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: **July 1, 2019– December 31, 2019**

requirements is not required until April 1, 2021.

- *Paragraph 29 - NO<sub>x</sub> Monitoring Requirements*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until April 1, 2021.

- e. A copy of the protocol for any PM stack tests performed in accordance with the requirements of Paragraph 31**

- *Paragraph 31 - PM Stack Testing*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required to begin until 180 days after April 1, 2021, or September 29, 2021.

- f. All PM Early Warning System data collected, from the time a PM Early Warning System alarm is triggered until the PM Early Warning System data have returned to normal operating ranges, below levels triggering an alarm condition, and an explanation of any periods of PM Early Warning System downtime**

Data collected for each event in which a PM Early Warning System alarm was triggered during this reporting period is presented in **Attachment 1**.

A summary of the periods of PM Early Warning System downtime that occurred during unit operations, providing the required explanation for each such period, is presented in **Attachment 2**.

- g. A description of any violation of the requirements of this Consent Decree, including any violation resulting from Malfunctions, any exceedance of an Emissions Limit, any exceedance of a 30-day rolling Average Sulfur Content Weight Percent or 365-day Rolling Average Weight Percent, or any failure to install, commence operation or Continuously Operate and Control Technology or any PM Early Warning System, which includes:**

- i. *the date and duration of, and the quantity of any emissions related to, the violation;*
- ii. *a full explanation of the primary root cause and any other significant contributing cause(s) of the violation;*
- iii. *a root cause analysis of all reasonable interim and long-term remedial steps or corrective actions, including all design, operation, and maintenance changes consistent with good engineering practices, if any, that could be taken to reduce or eliminate the probability of recurrence of such violation, and, if not already completed, a schedule for its (their) implementation, or, if Defendant concludes that remedial steps or corrective actions should not be conducted, the basis for that conclusion.*

Cabot is not aware of any violation of the requirements of the Consent Decree during this reporting period.

- h. If no violations occurred during a reporting period, a statement that no violations occurred:**

Cabot is not aware of any violation of the requirements of the Consent Decree during this reporting period.

- i. A description of the status of any permit applications and any proposed SIP revisions required under this Consent Decree**

**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**CANAL PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

Cabot applied for and obtained an Authorization to Construct and Approval to Operate on December 28, 2015 (Agency Interest Number 19901) from the Louisiana Department of Environmental Quality for the installation of the pollution control equipment required by the Consent Decree.

- j. A summary of all actions undertaken and Project Dollars expended during the reporting period, as well as any cumulative Project Dollars expended, and the estimated environmental benefits achieved to date in satisfaction of the requirements of Section V (Environmental Mitigation) and Appendix A.*

The mitigation project was completed on February 27, 2017. Cabot filed the completion report with the EPA on March 9, 2017. With this submittal, all provisions of the Environmental Mitigation have been completed.

CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**CANAL PLANT**

REPORTING PERIOD: **July 1, 2019– December 31, 2019**

**ATTACHMENT 1**

**PM EARLY WARNING SYSTEM DATA COLLECTED DURING HIGH PM EMISSIONS EVENTS**

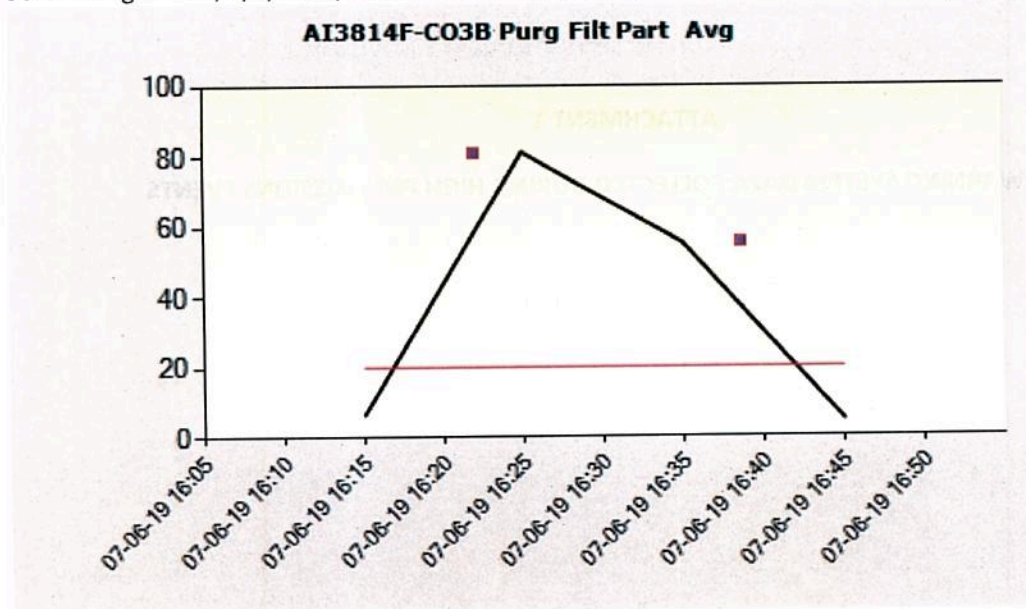


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

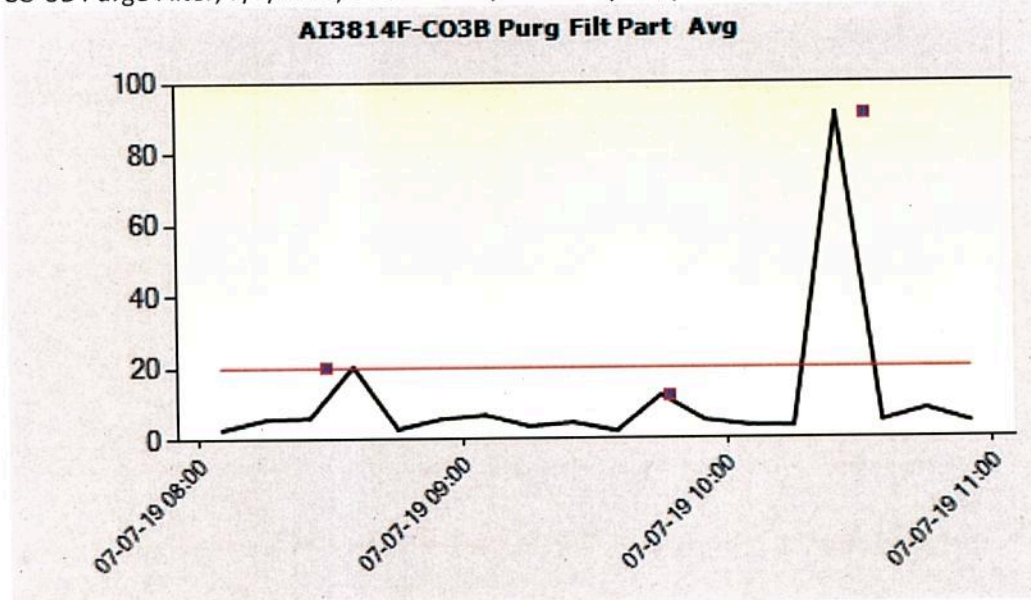
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3B Purge Filter, 7/6/2019, 16:25 to 16:35; Sudden spike; possible moisture on probe; trended down.



CO-3B Purge Filter, 7/7/2019, 8:35 – 10:35; Sudden spike; pulled and cleaned the probe; trended down.

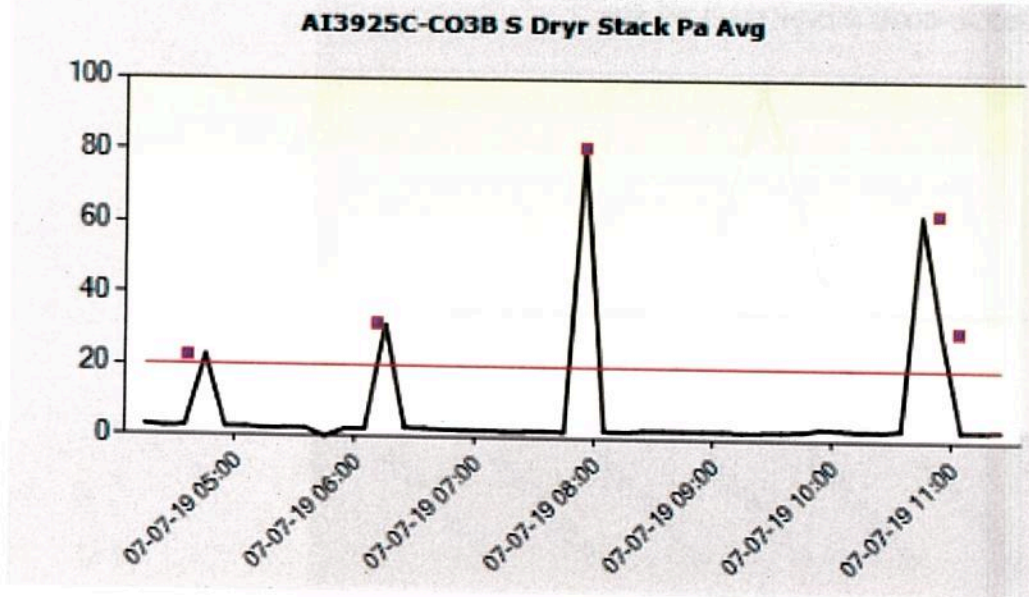


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

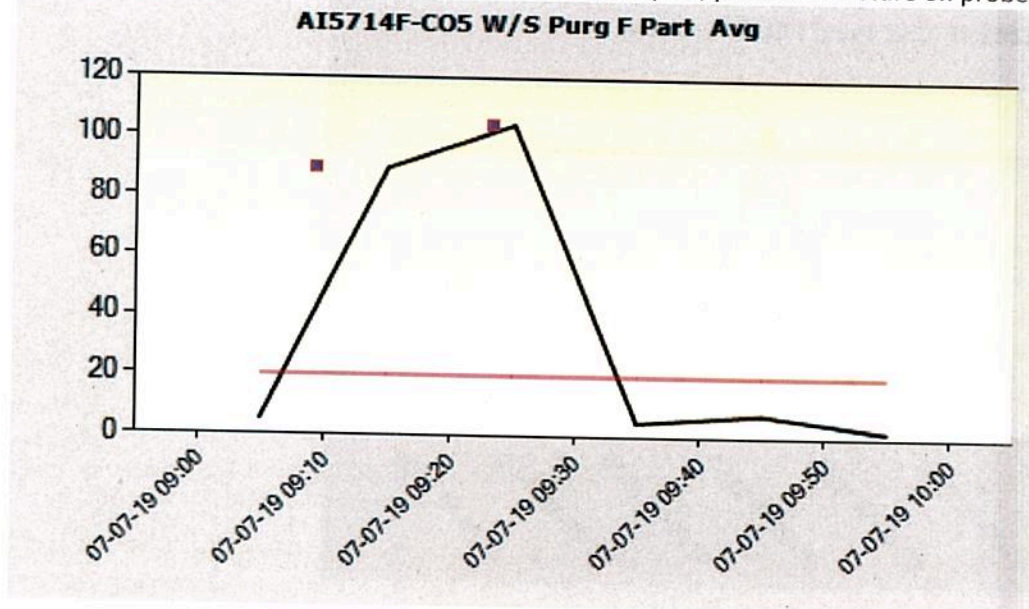
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3B S Dryer, 7/7/2019, 4:45 – 11:05; Sudden spikes; trended down; pulled and cleaned the probe.



CO-5 W/S Purge Filter, 7/7/2019, 9:15 – 9:35; Sudden spike; possible moisture on probe; trended down.

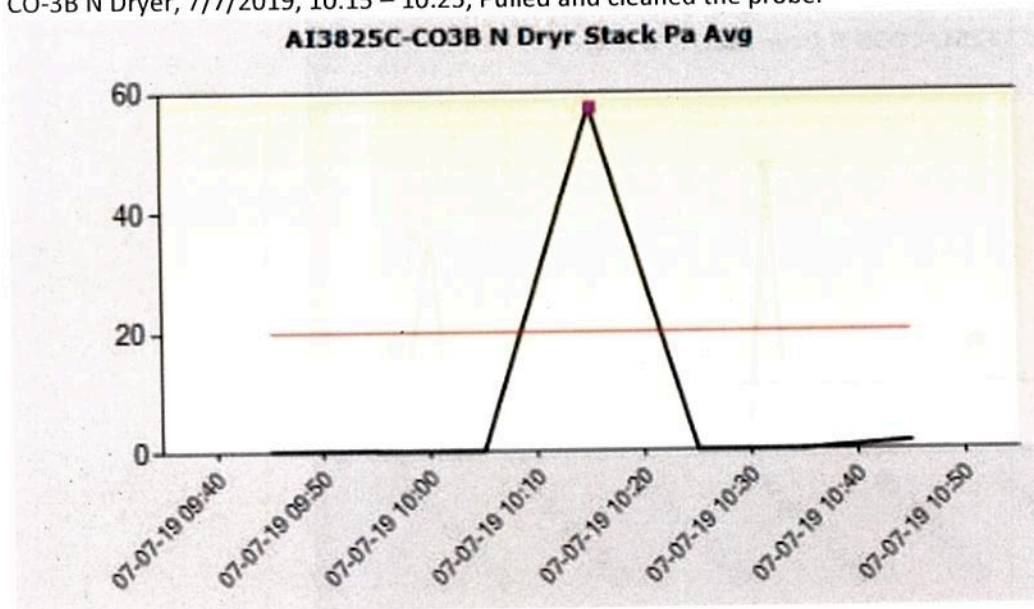


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

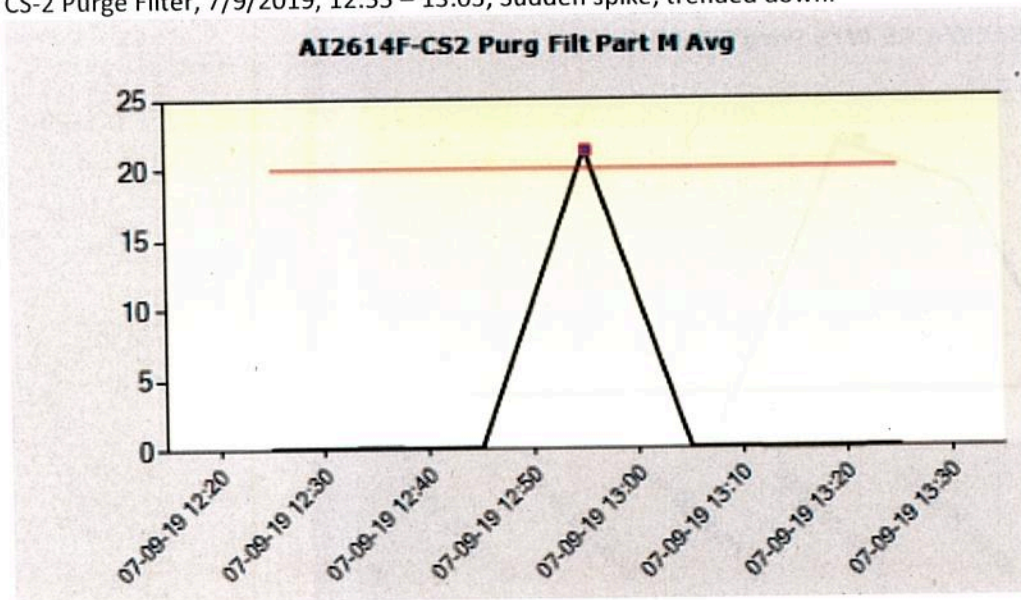
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3B N Dryer, 7/7/2019, 10:15 – 10:25; Pulled and cleaned the probe.



CS-2 Purge Filter, 7/9/2019, 12:55 – 13:05; Sudden spike; trended down.



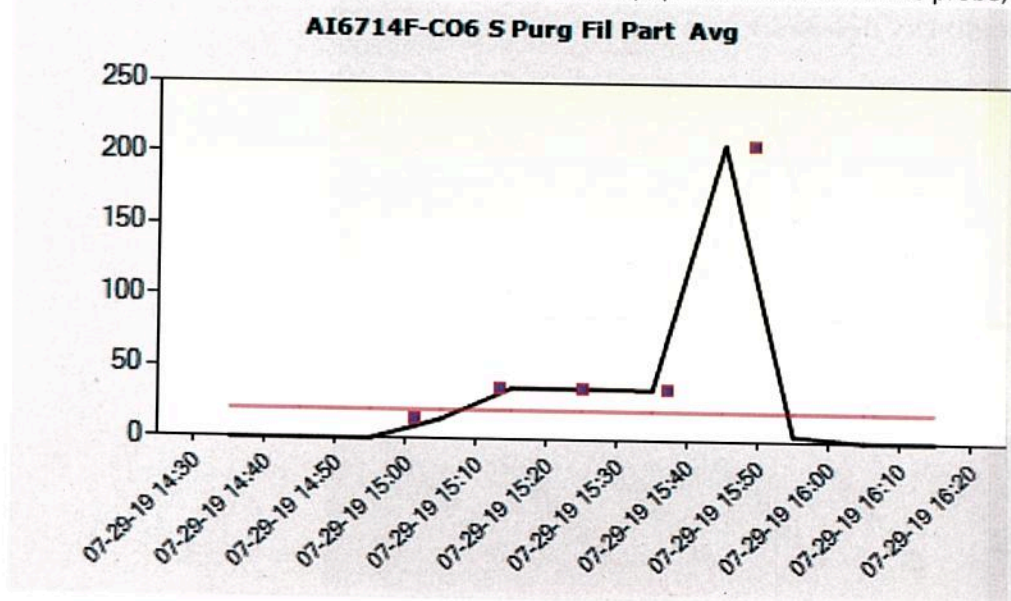


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

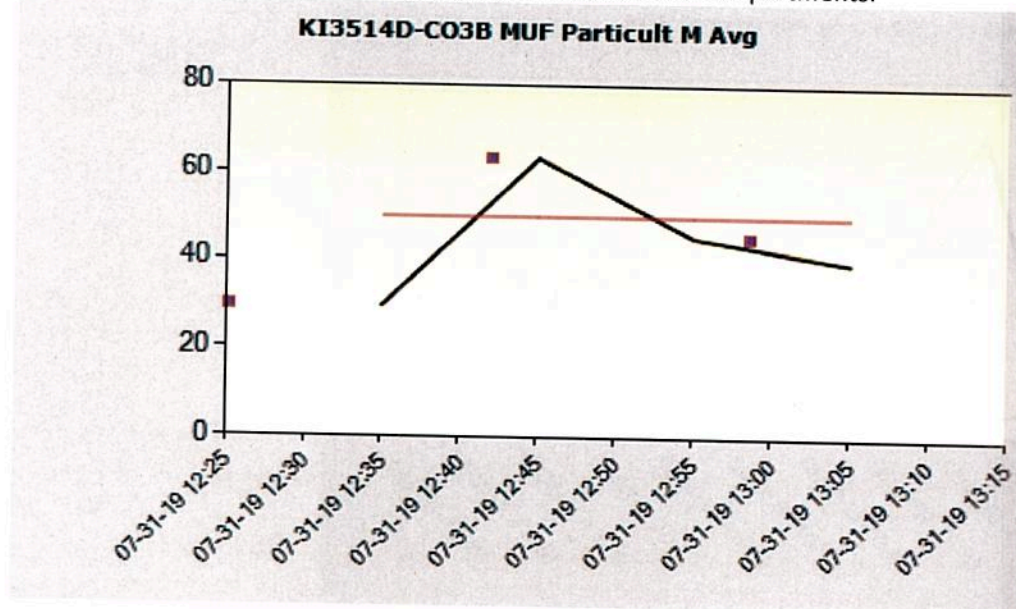
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-6 S Purge Filter, 7/29/2019, 15:05 – 15:55; Start-up; pulled and cleaned the probe; trended down.



CO-3B MUF, 7/31/2019, 12:45 – 12:55; Filter leak; isolated compartments.

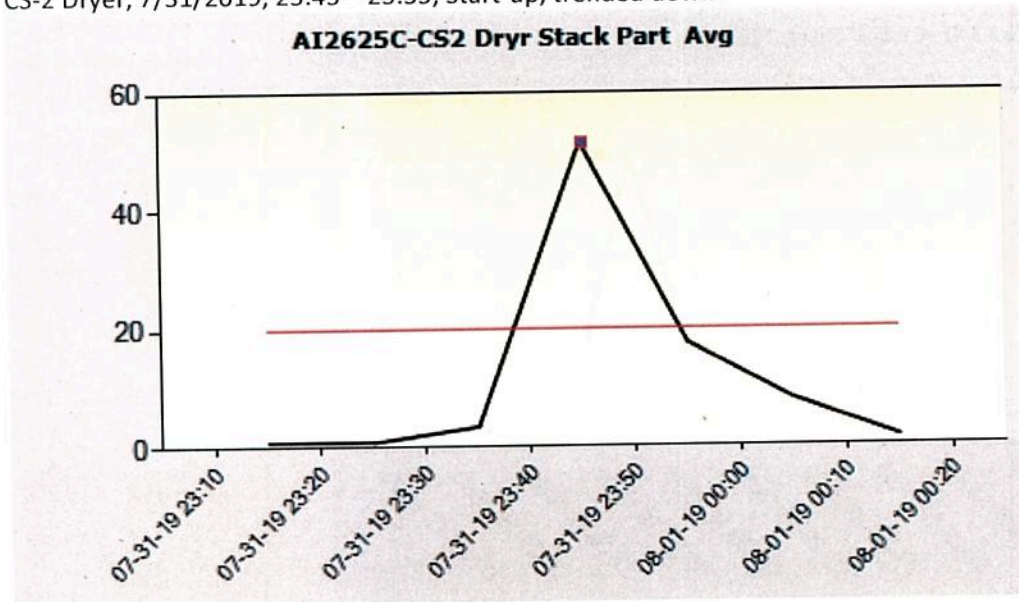


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

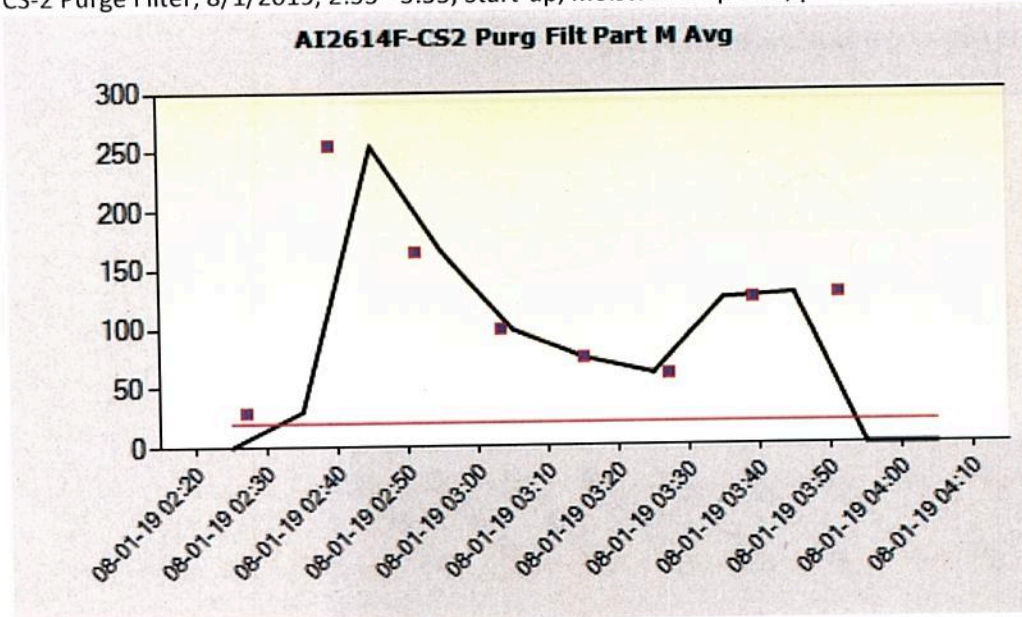
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CS-2 Dryer, 7/31/2019, 23:45 – 23:55; Start-up; trended down.



CS-2 Purge Filter, 8/1/2019, 2:35 - 3:55; Start-up; moisture on probe; pulled and cleaned probe; trended down.

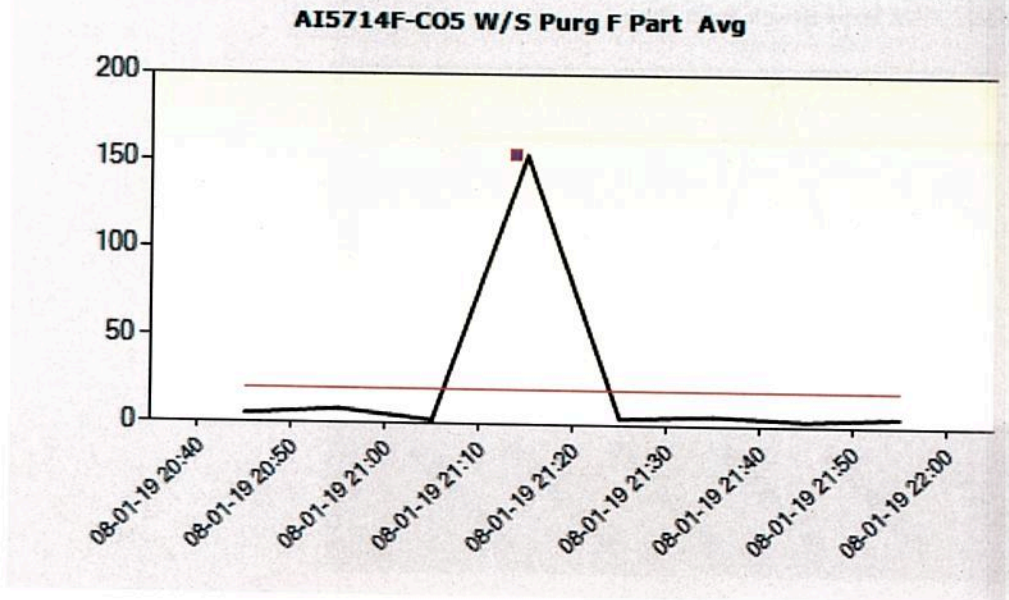


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

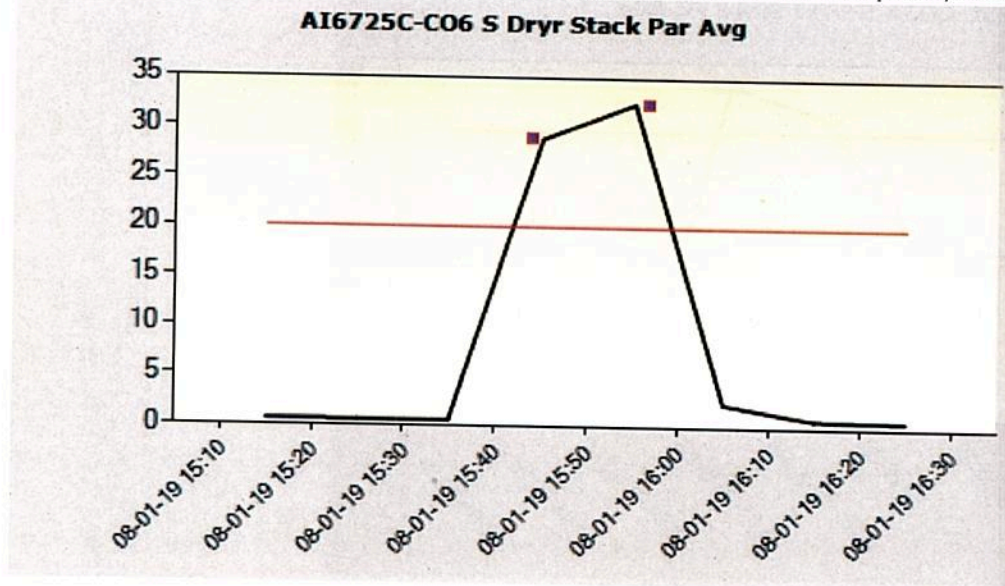
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-5 W/S Purge Filter, 8/1/2019, 21:15 – 21:25; Rain event; moisture on probe; pulled and cleaned probe.



CO-6 S Dryer, 8/1/2019, 15:45 – 16:05; Rain event; suspected moisture on probe; trended down.



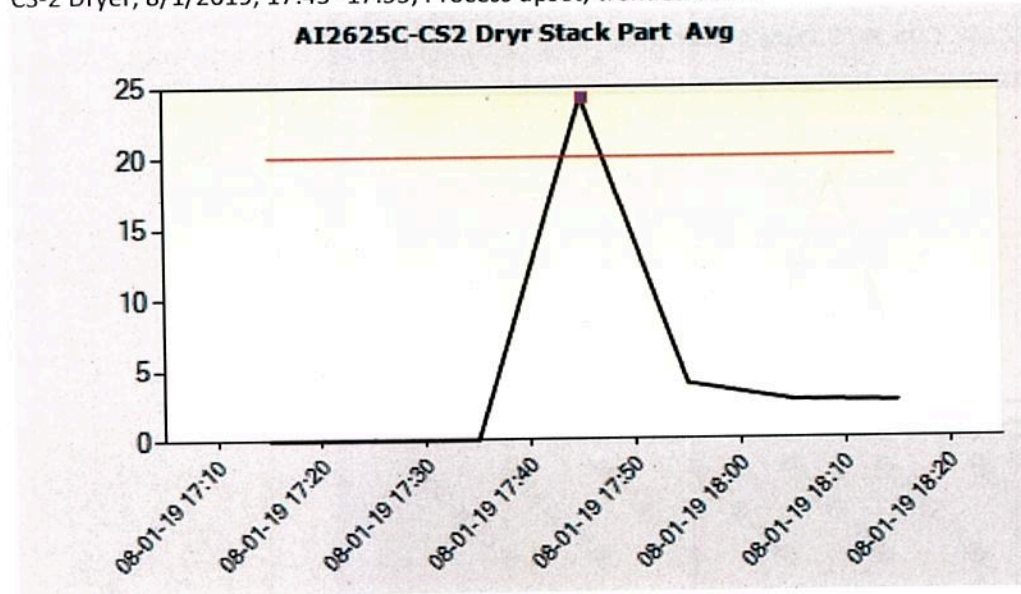


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

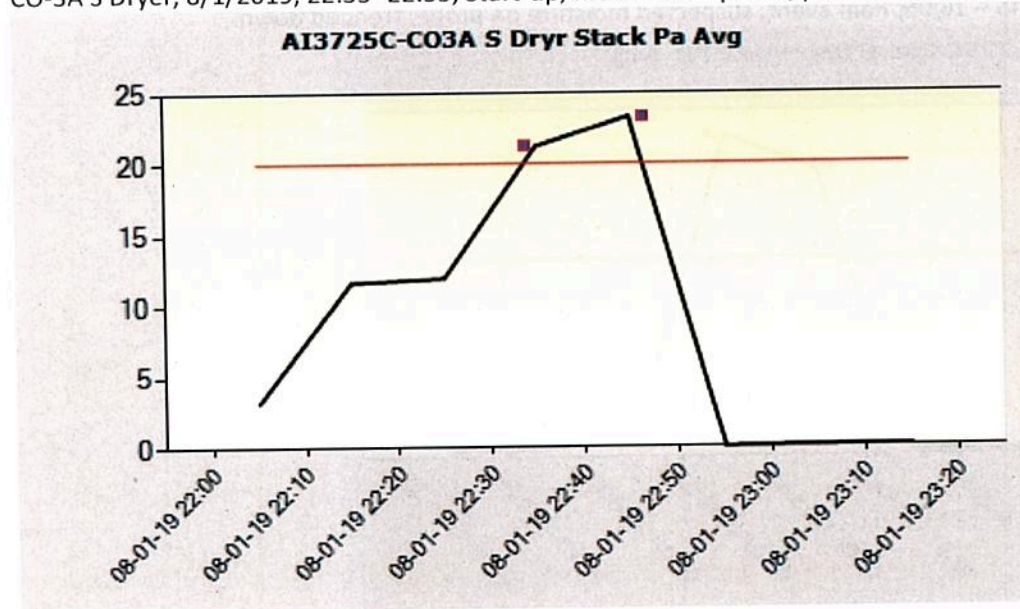
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CS-2 Dryer, 8/1/2019, 17:45- 17:55; Process upset; trended down.



CO-3A S Dryer, 8/1/2019, 22:35- 22:55; Start-up; moisture on probe; pulled and cleaned probe.

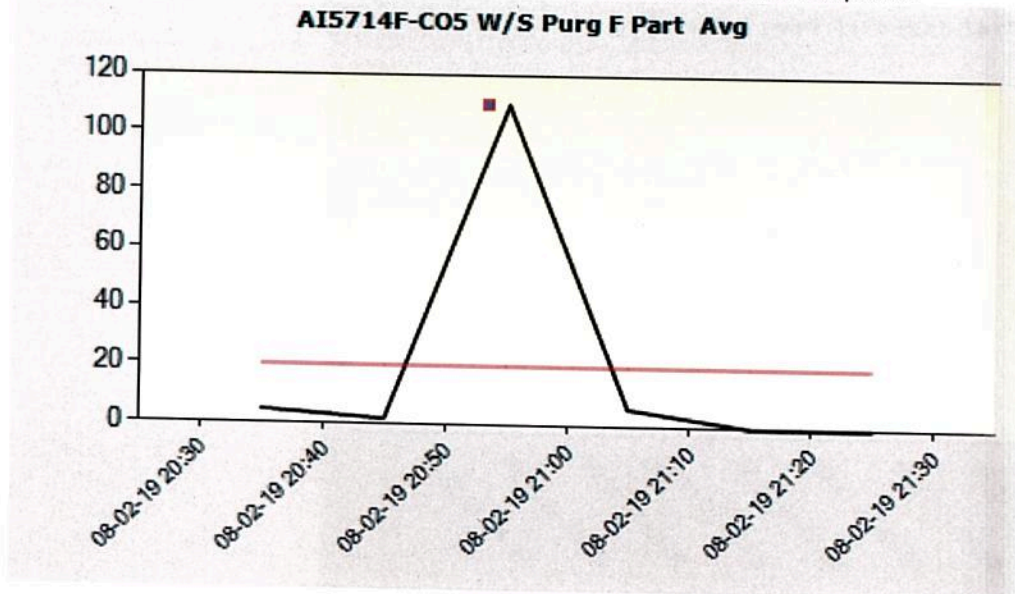


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

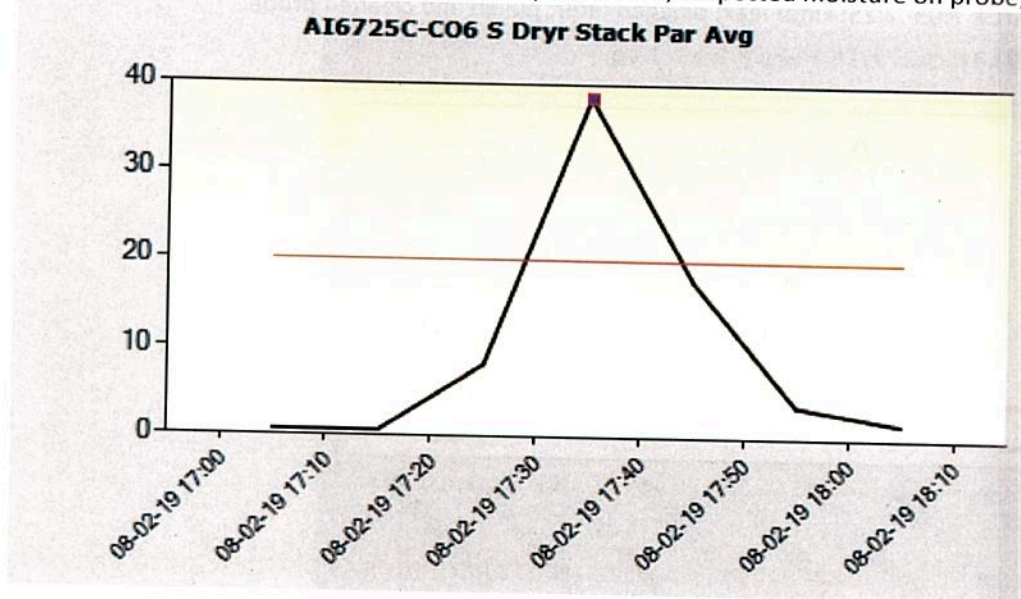
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-5 W/S Purge Filter, 8/2/2019, 20:55 – 21:05; Pulled and cleaned the probe.



CO-6 S Dryer, 8/2/2019, 17:35 – 17:45; Heavy rain event; suspected moisture on probe; trended down.

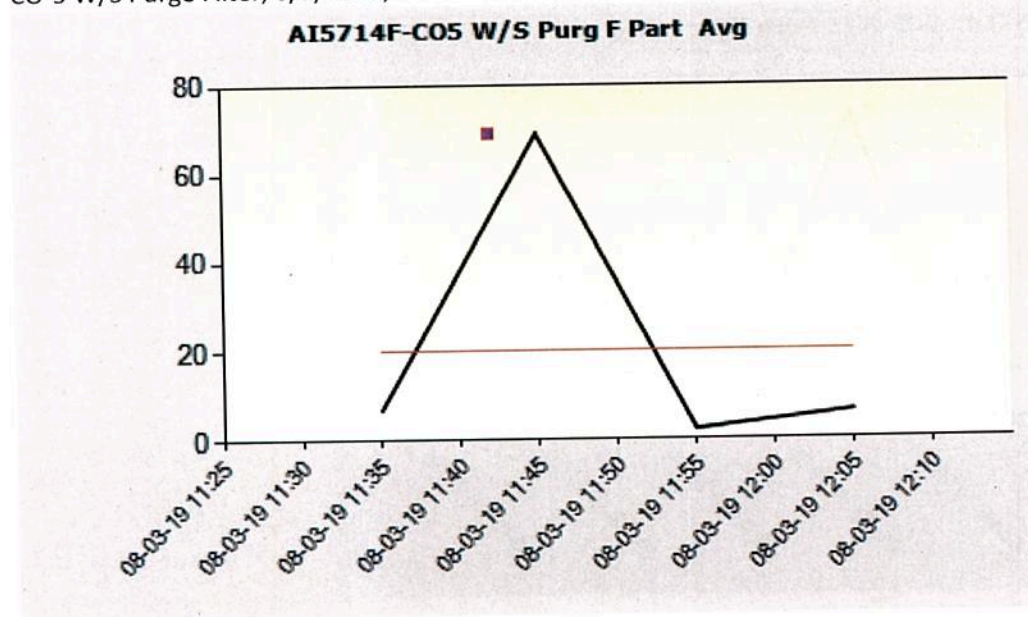


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

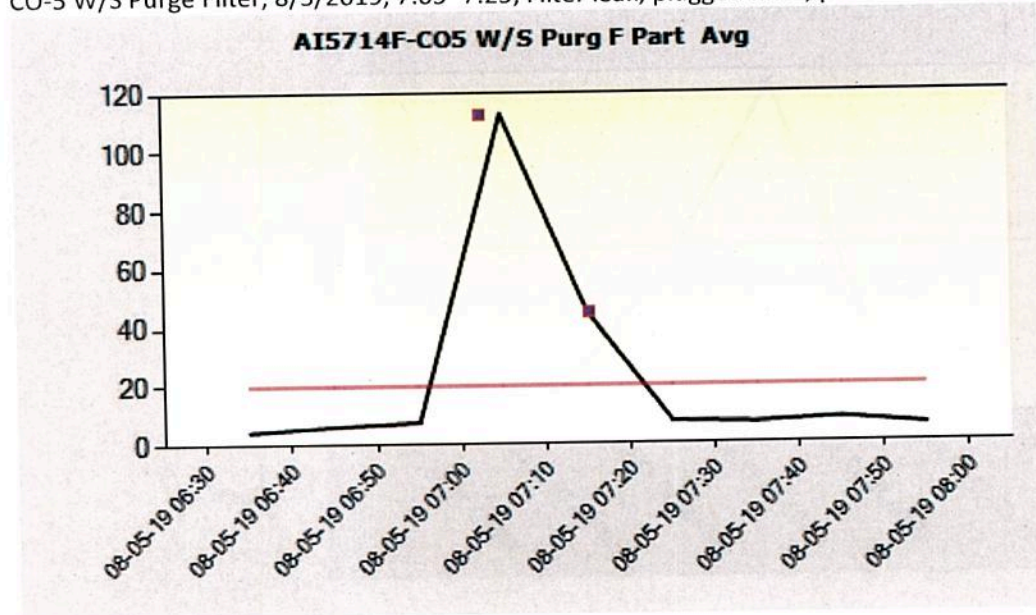
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-5 W/S Purge Filter, 8/3/2019, 11:45 – 11:55; Pulled and cleaned the probe after plugging the filter.



CO-5 W/S Purge Filter, 8/5/2019, 7:05- 7:25; Filter leak; plugged filter; pulled and cleaned probe.





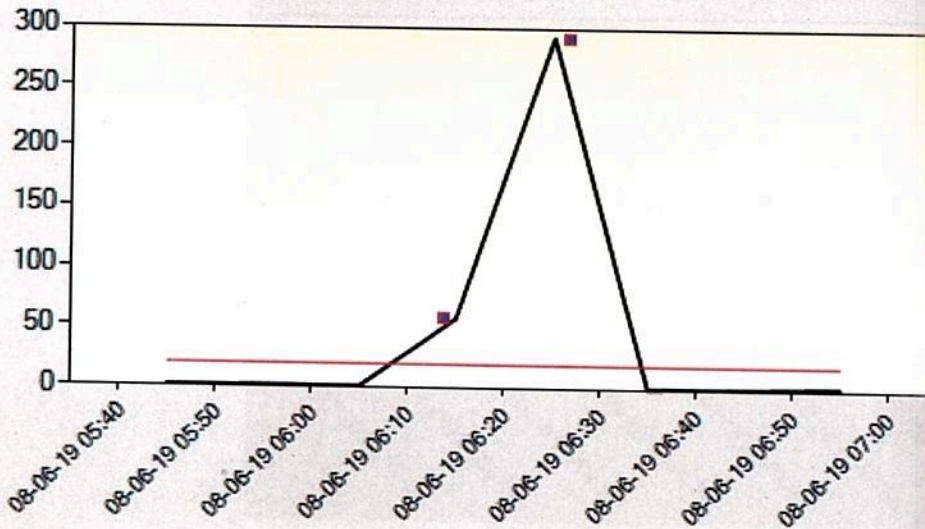
CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

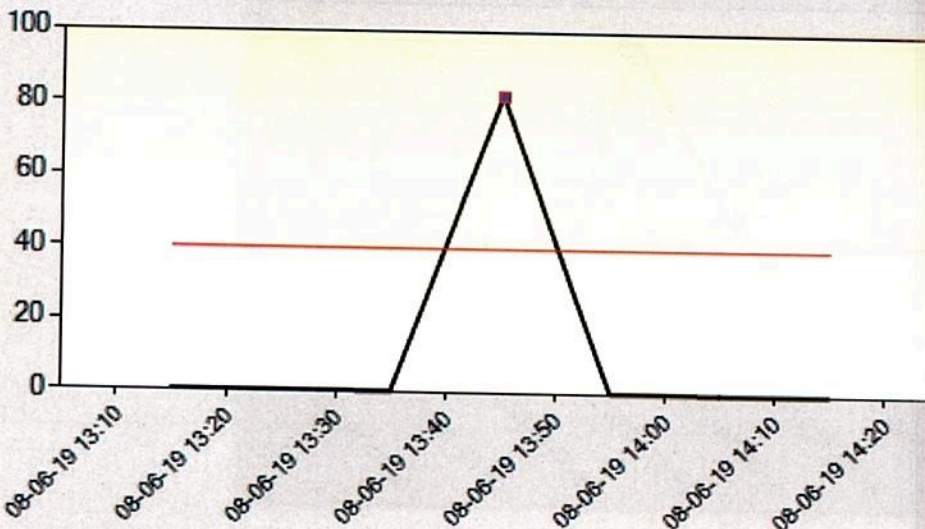
CO-6 N Dryer, 8/6/2019, 6:15 – 6:35; Moisture on probe; pulled and cleaned probe.

AI6625C-CO6 N Dryr Stack Par Avg



CO-6 N Purge Filter, 8/6/2019, 13:45- 13:55; Build-up on probe; pulled and clean probe.

AI6614F-CO6 N Purg Fil Part Avg



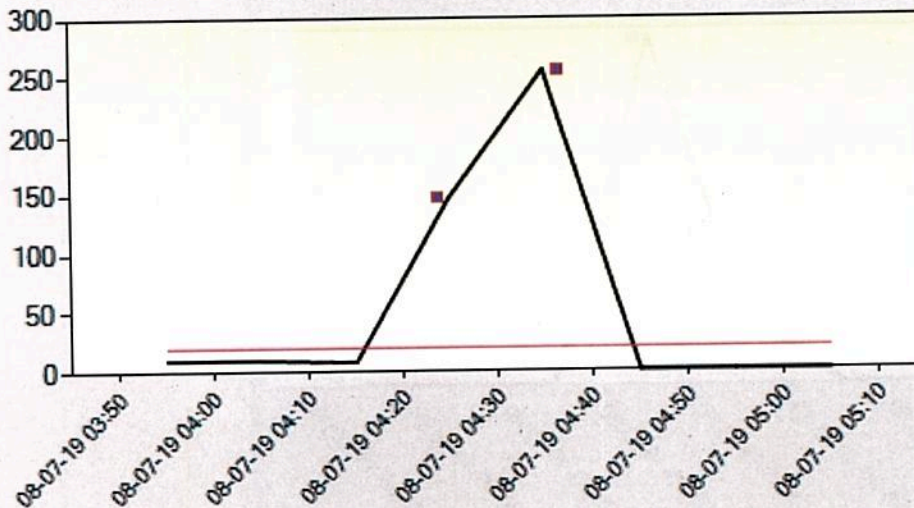
CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

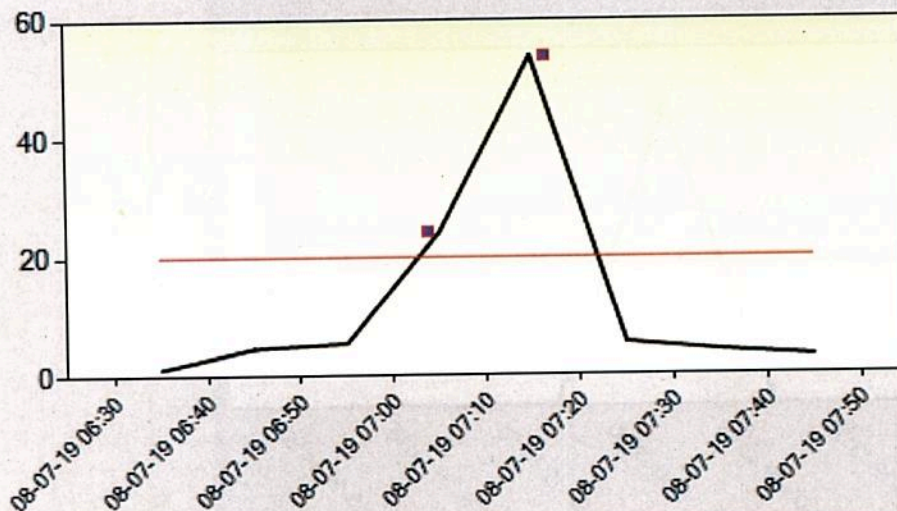
CO-6 N Dryer, 8/7/2019, 4:25- 4:45; Pulled and clean probe.

AI6625C-CO6 N Dryr Stack Par Avg



CS-2 Dryer, 8/7/2019, 7:05- 7:25; Start-up; trended down.

AI2625C-CS2 Dryr Stack Part Avg

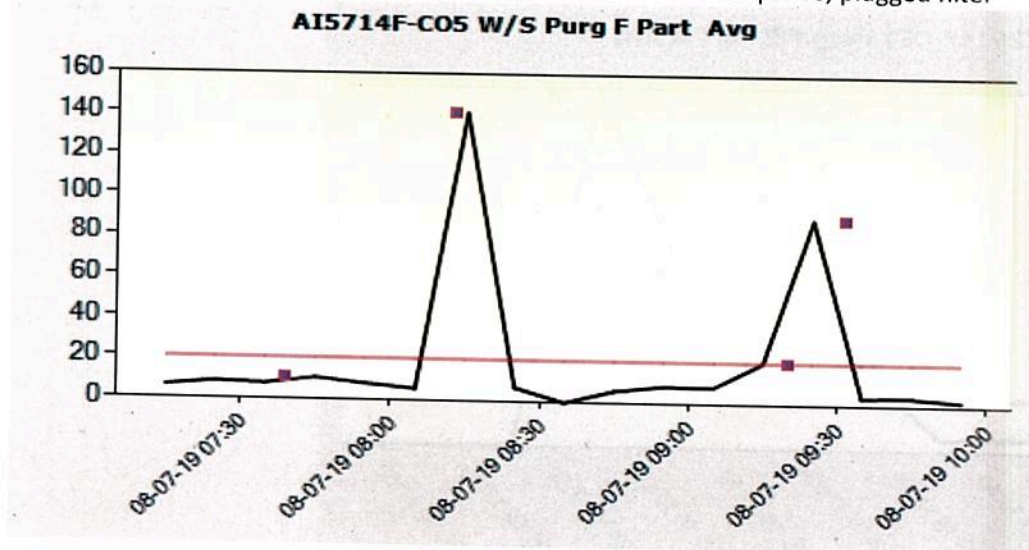


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

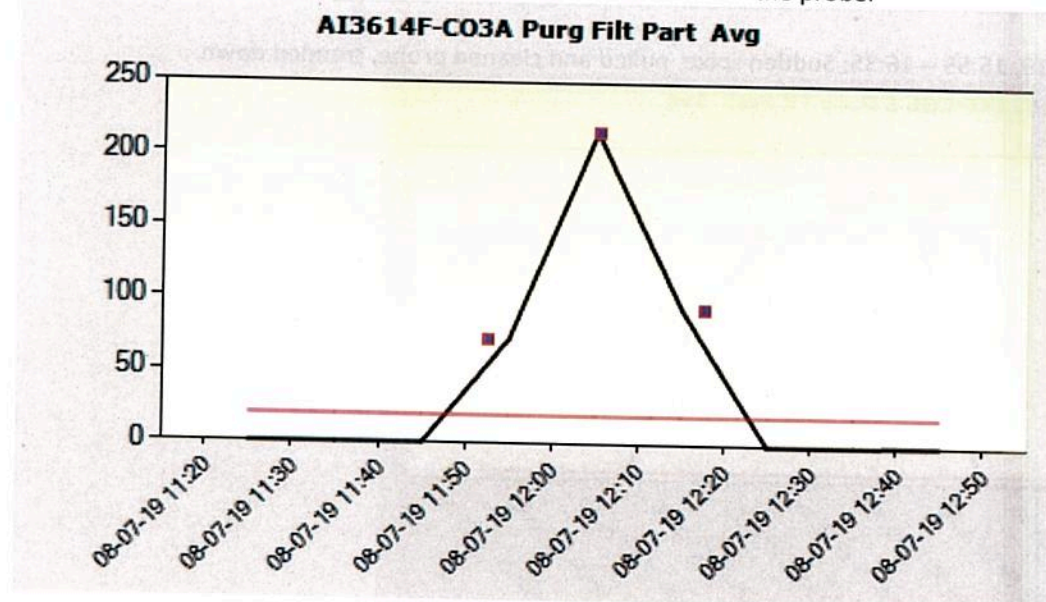
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-5 W/S Purge Filter, 8/7/2019, 8:15- 9:35; Pulled and cleaned probe; plugged filter



CO-3A Purge Filter, 8/7/2019, 11:55- 12:25; Pulled and cleaned the probe.



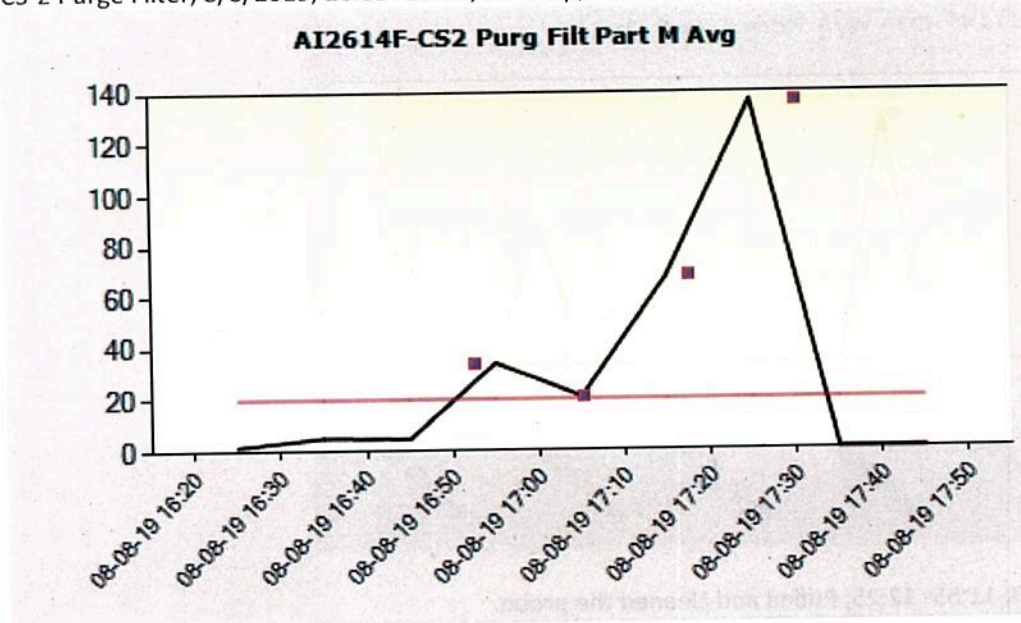


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

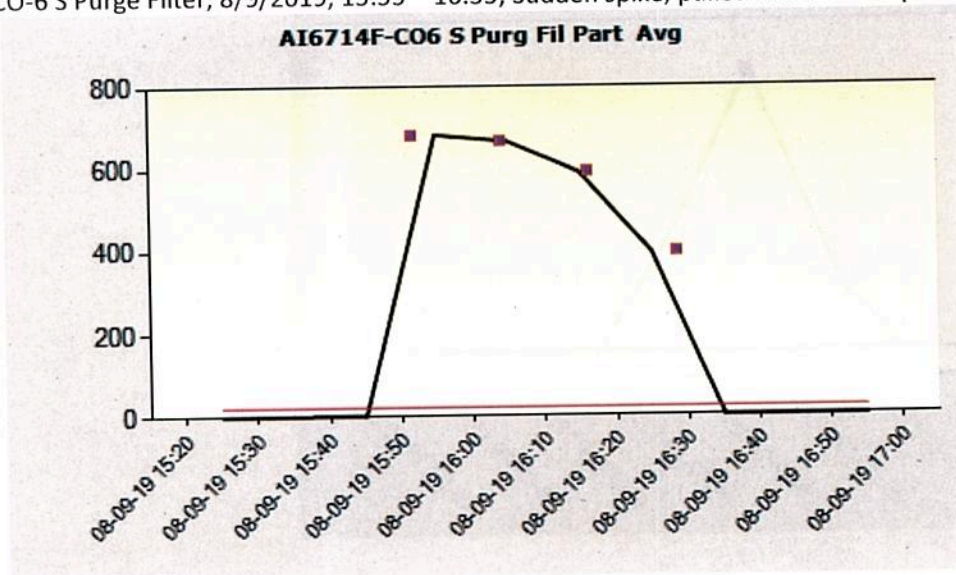
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CS-2 Purge Filter, 8/8/2019, 16:55- 17:35; Start-up; moisture on probe; pulled and cleaned probe; trended down.



CO-6 S Purge Filter, 8/9/2019, 15:55 – 16:35; Sudden spike, pulled and cleaned probe, trended down.

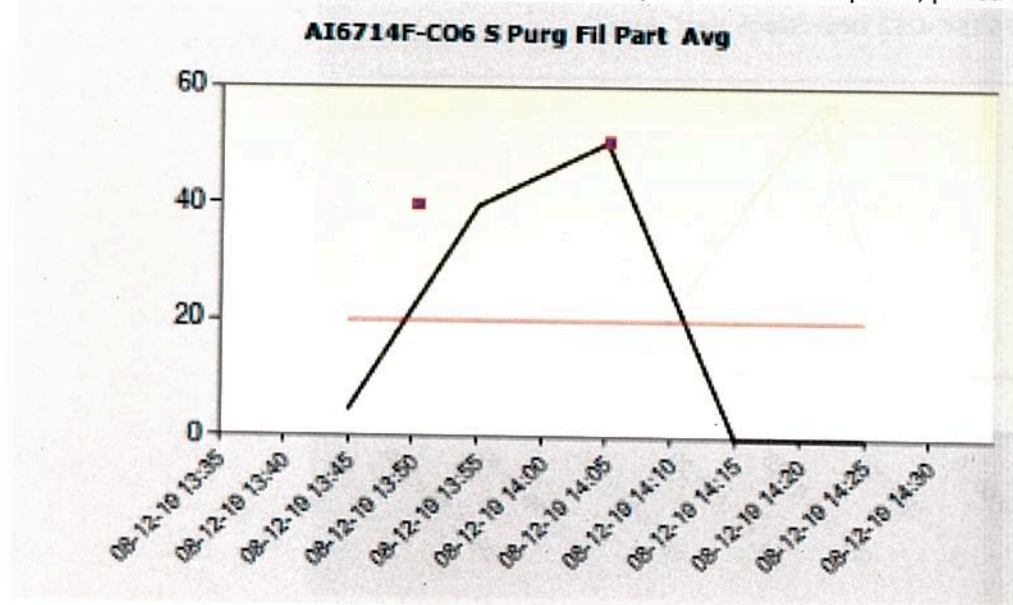


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

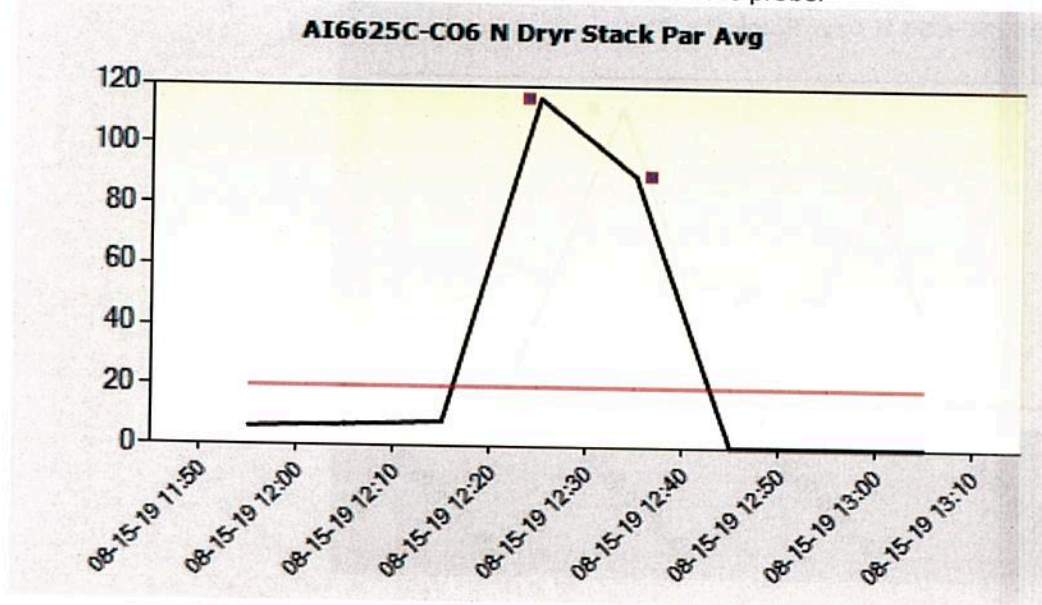
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-6 S Purge Filter, 8/12/2019, 13:55- 14:15; Sudden spike; moisture on probe; pulled and cleaned probe.



CO-6 N Dryer, 8/15/2019, 12:25- 12:45; Pulled and cleaned the probe.

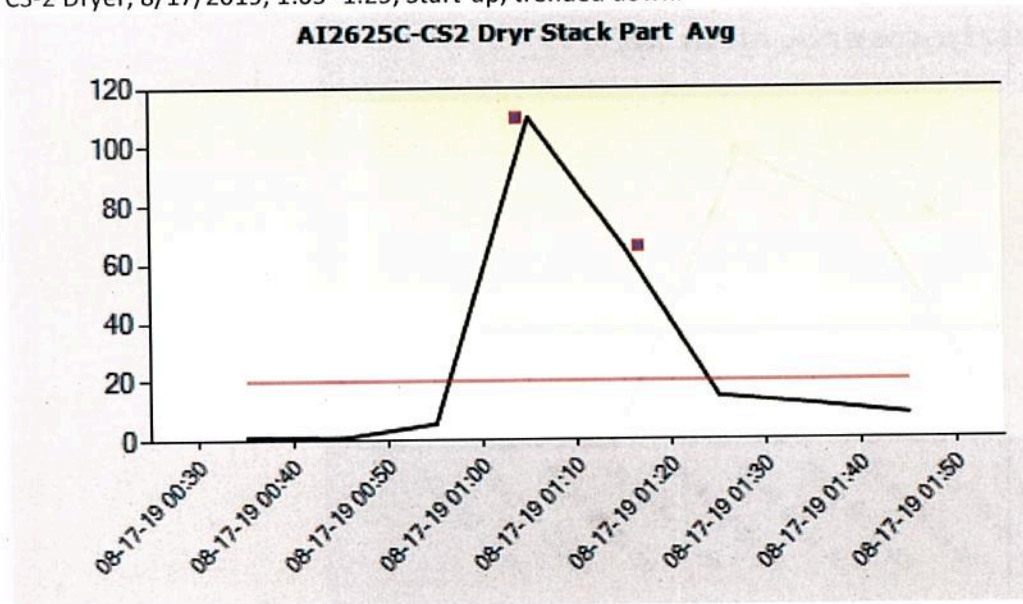


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

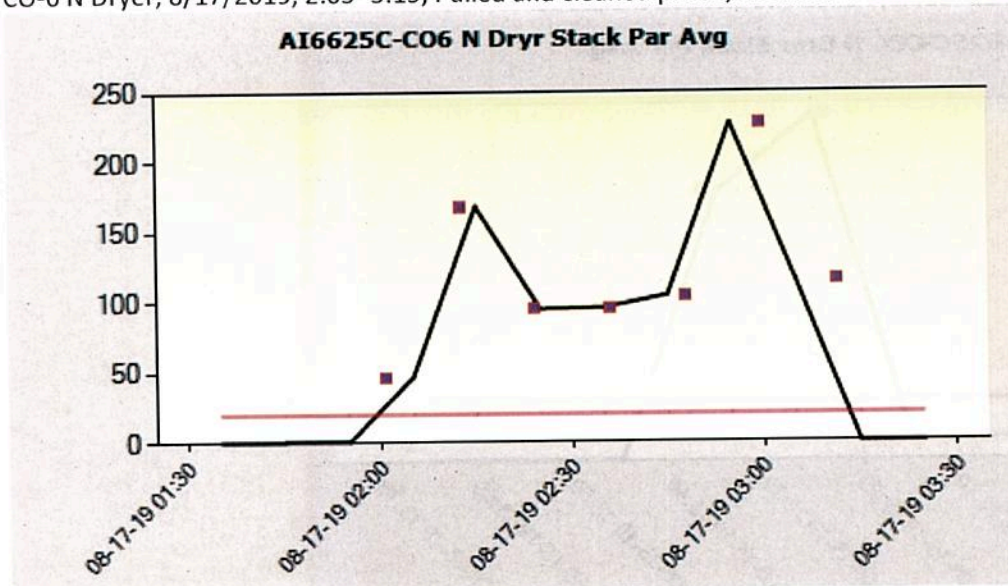
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CS-2 Dryer, 8/17/2019, 1:05- 1:25; Start-up; trended down.



CO-6 N Dryer, 8/17/2019, 2:05- 3:15; Pulled and cleaned probe; technical difficulties; troubleshooting/ repairing probe.





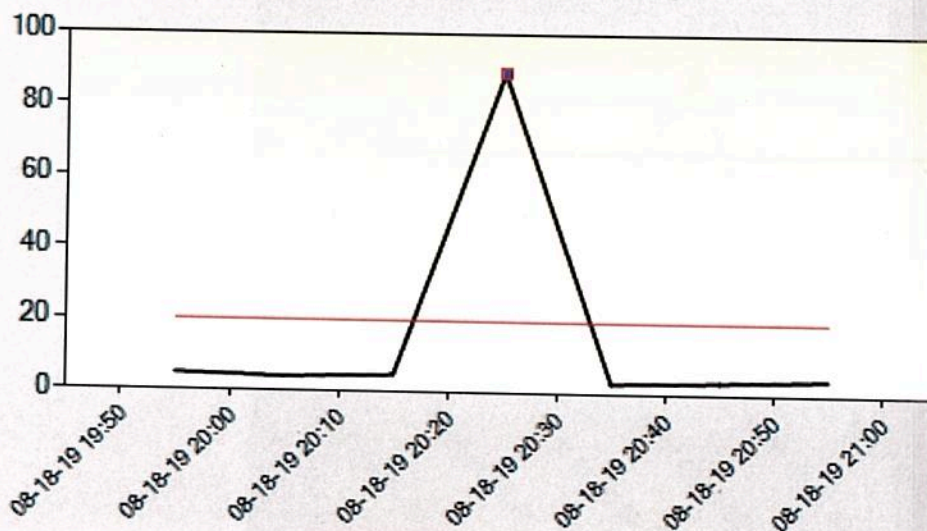
CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

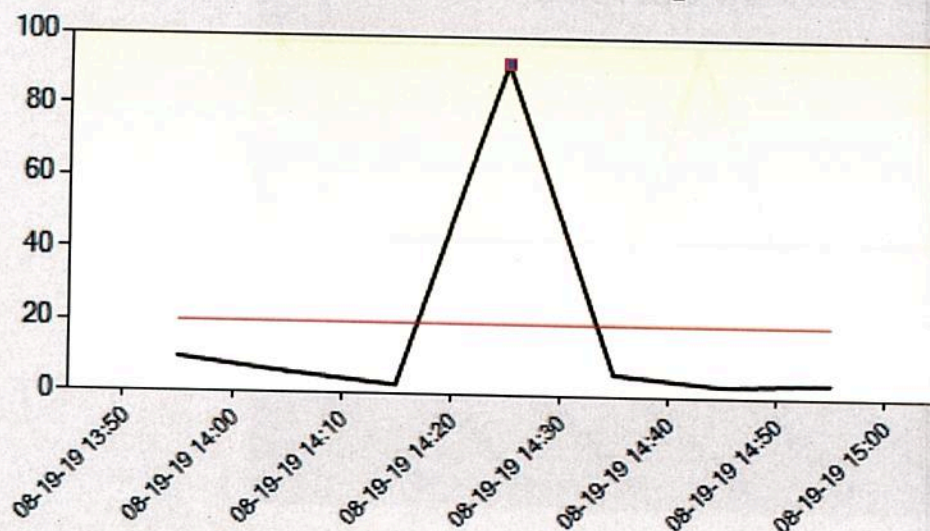
CO-6 N Dryer, 8/18/2019, 20:25- 20:35; Pulled and cleaned the probe.

AI6625C-CO6 N Dryr Stack Par Avg



CO-5 W/S Purge Filter, 8/19/2019, 14:25- 14:35; Heavy rain event; trended down.

AI5714F-CO5 W/S Purg F Part Avg



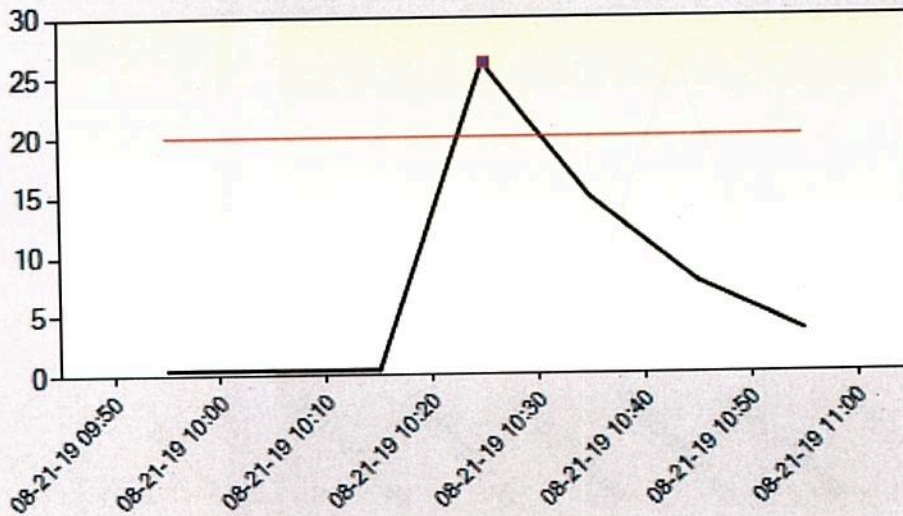
CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

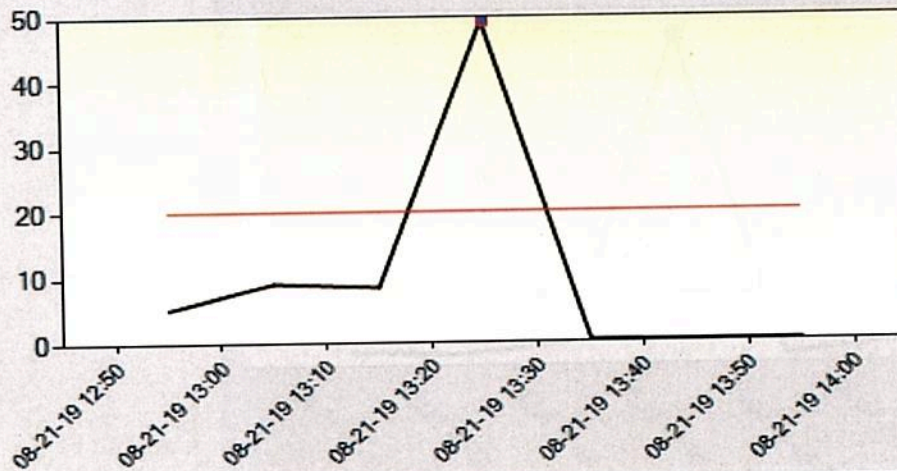
CO-6 S Dryer, 8/21/2019, 10:25- 10:35; Heavy rain event; trended down.

AI6725C-CO6 S Dryr Stack Par Avg



CO-3A N Dryer, 8/21/2019, 13:25- 13:35; Pulled and cleaned the probe.

AI3625C-CO3A N Dryr Stack Pa Avg

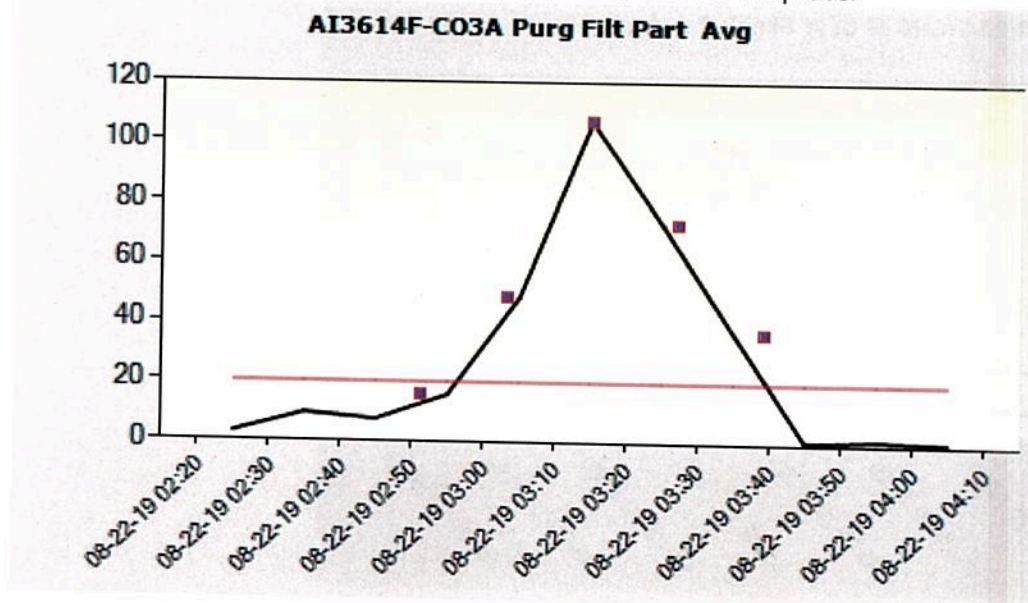


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

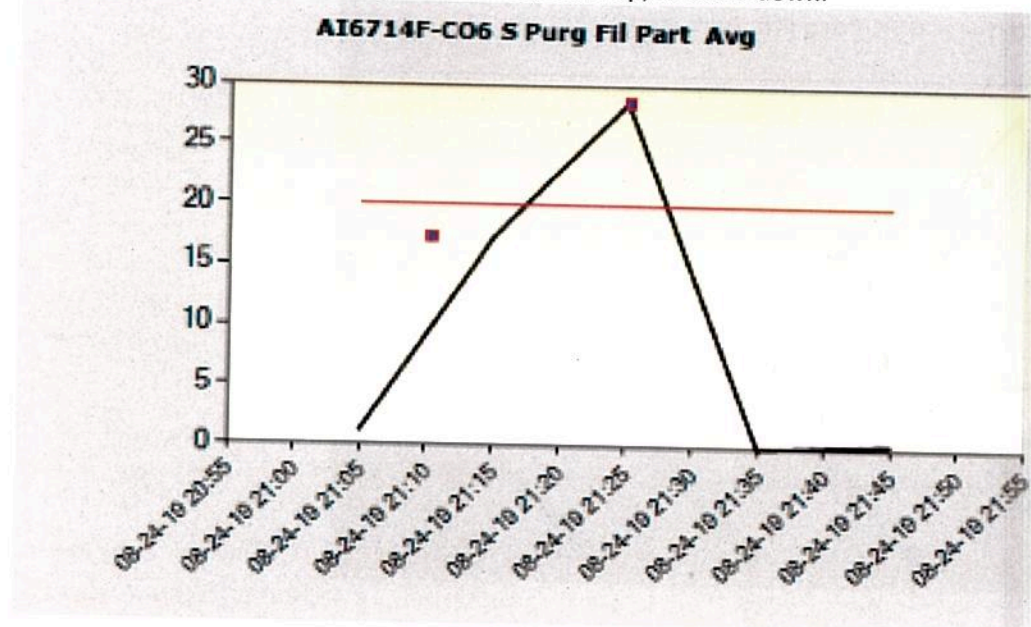
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A Purge Filter, 8/22/2019, 3:05- 3:45; Pulled and cleaned the probe.



CO-6 S Purge Filter, 8/24/2019, 21:25- 21:35; Start-up; trended down.





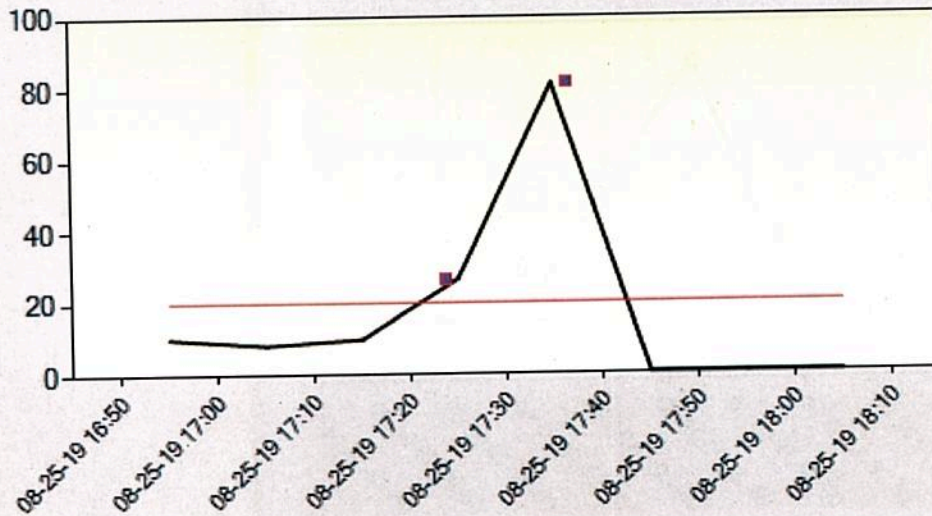
CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

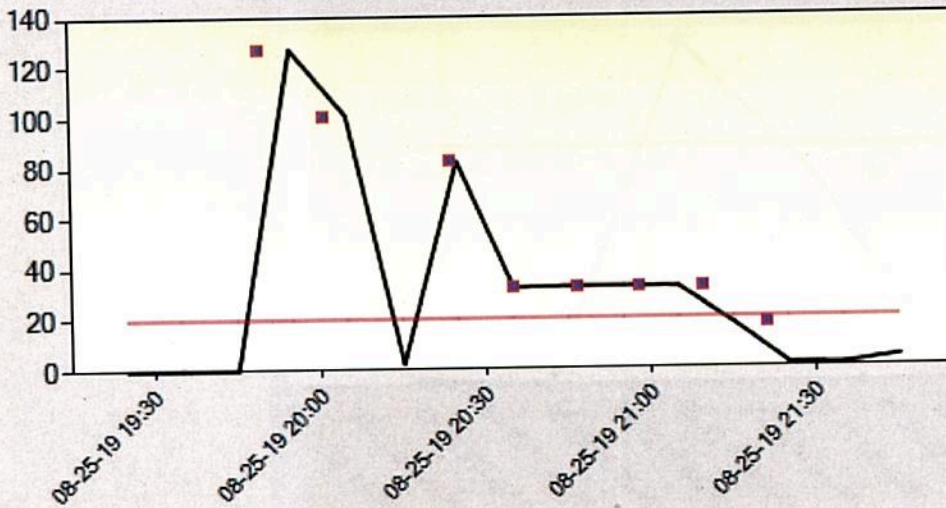
CO-6 N Dryer, 8/25/2019, 17:25- 17:45; Pulled and cleaned the probe.

AI6625C-CO6 N Dryr Stack Par Avg



CO-3A Purge Filter, 8/25/2019, 19:55- 21:15; Start-up; trended down.

AI3614F-CO3A Purg Filtr Part Avg

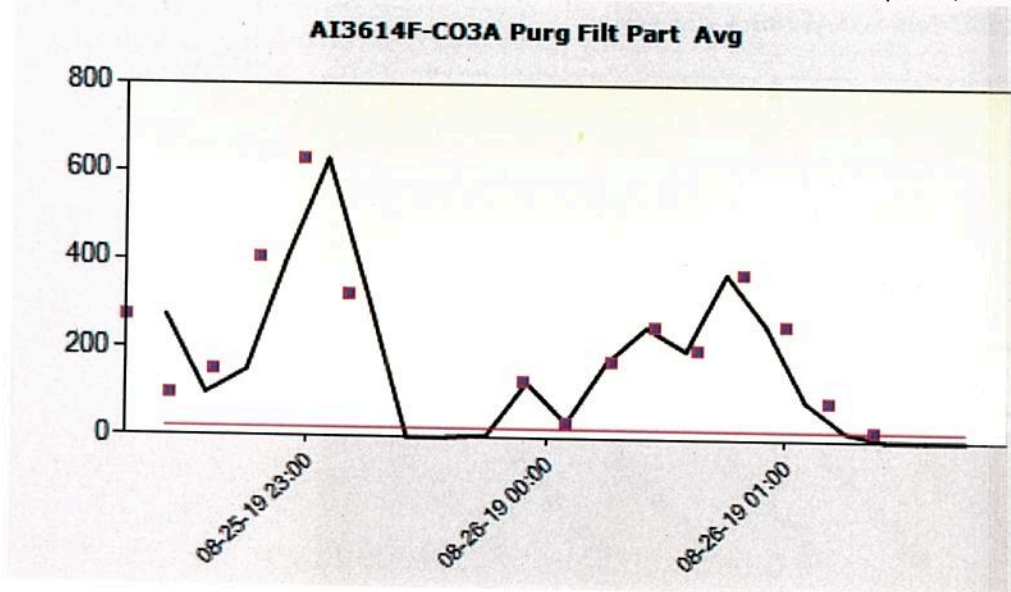


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

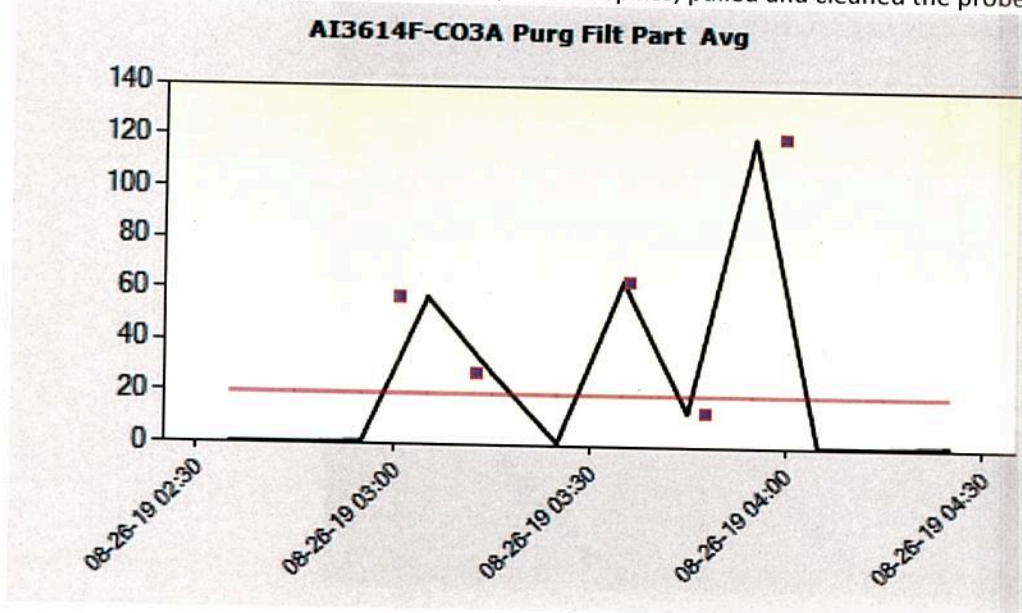
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A Purge Filter, 8/25/2019- 8/26/2019, 22:25- 1:25; Pulled and cleaned probe; troubleshooting/repairing probe.



CO-3A Purge Filter, 8/26/2019, 3:05- 4:05; Sudden spikes, pulled and cleaned the probe, trended down.

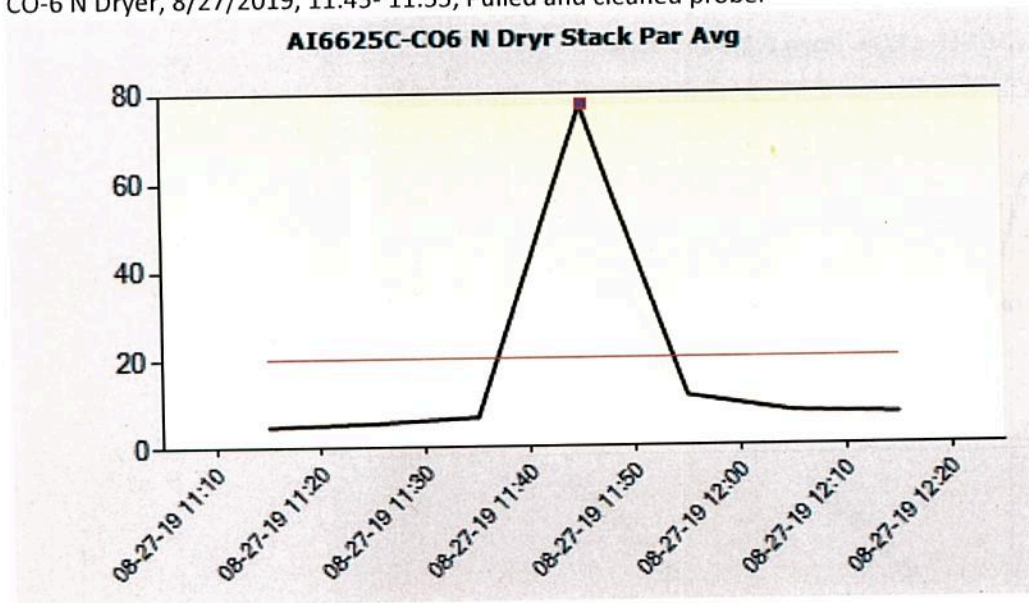


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

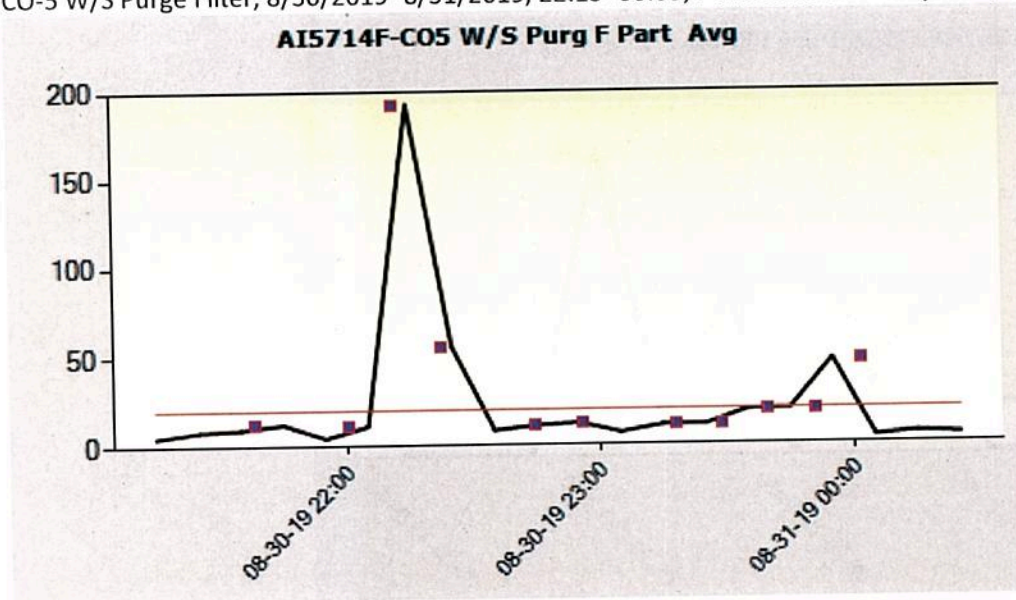
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-6 N Dryer, 8/27/2019, 11:45- 11:55; Pulled and cleaned probe.



CO-5 W/S Purge Filter, 8/30/2019- 8/31/2019, 22:15- 00:05; Pulled and cleaned probe; filter leak; plugged filter.





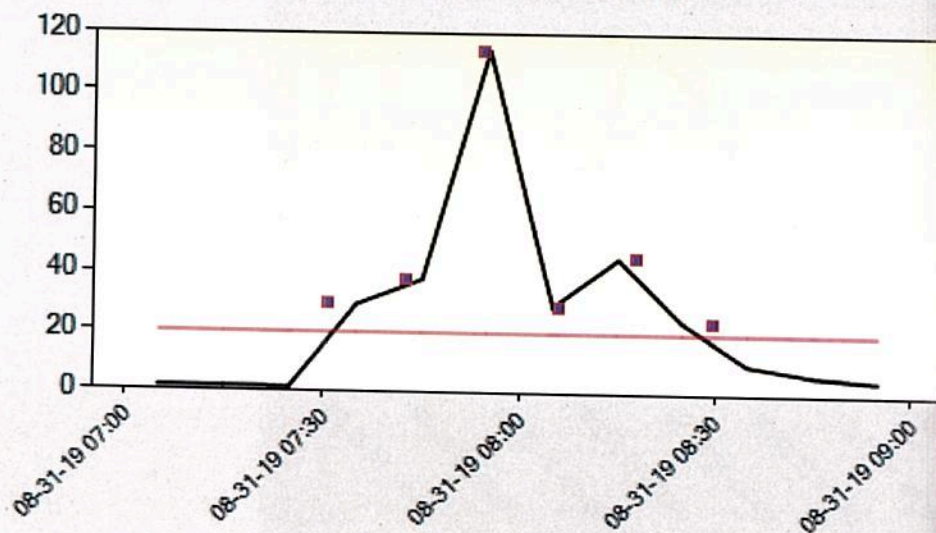
CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

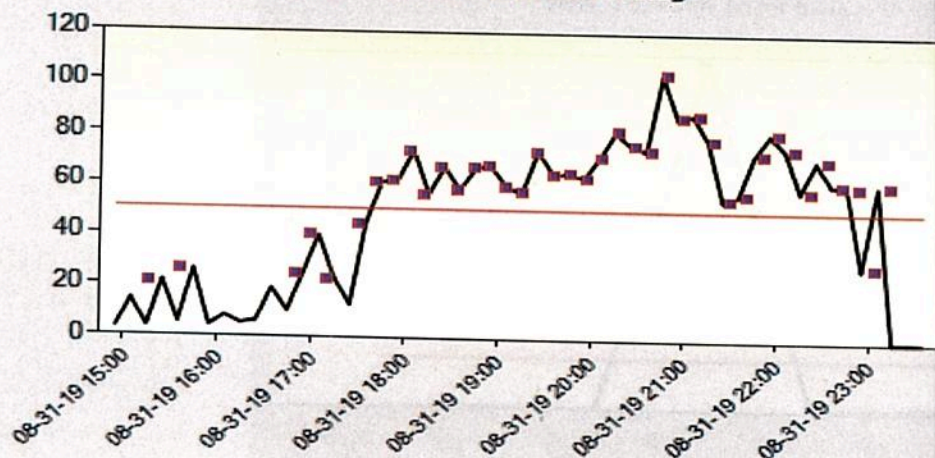
CS-2 Dryer, 8/31/2019, 7:35- 8:35, Sudden spike, suspected moisture on probe; trended down.

AI2625C-CS2 Dryr Stack Part Avg



CS-2 MUF, 8/31/2019, 17:45- 23:15, Suspected technical difficulties with the probe; pulled and cleaned the probe.

AI2514D-CS2 MUF Particulat M Avg



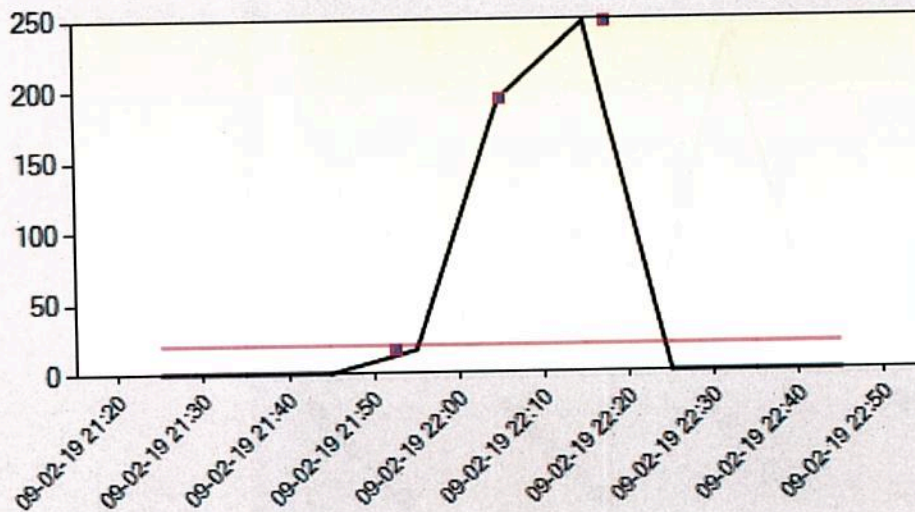
CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

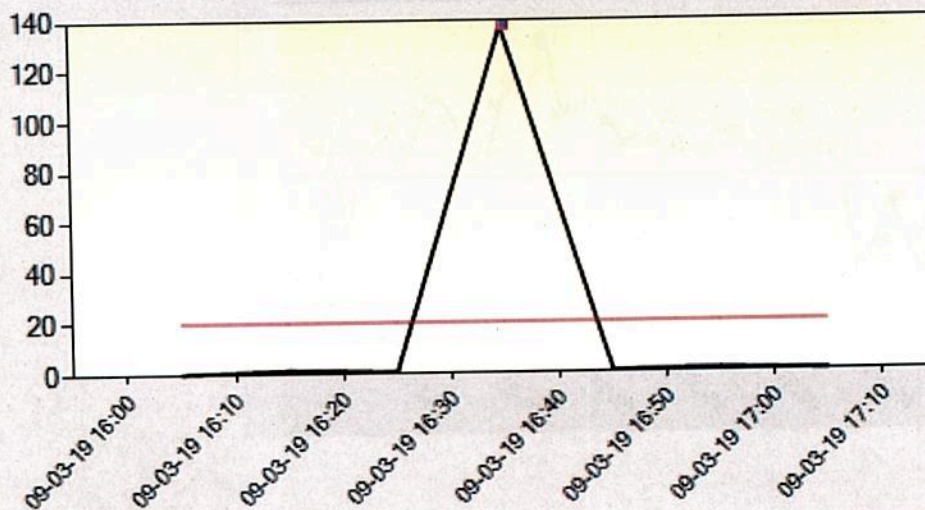
CO-3A Purge Filter, 9/2/2019, 22:05- 22:25; Start-up; pulled and cleaned probe.

AI3614F-CO3A Purg Filt Part Avg



CO-3B Purge Filter, 9/3/2019, 16:35- 16:45; Sudden spike; trended down.

AI3814F-CO3B Purg Filt Part Avg



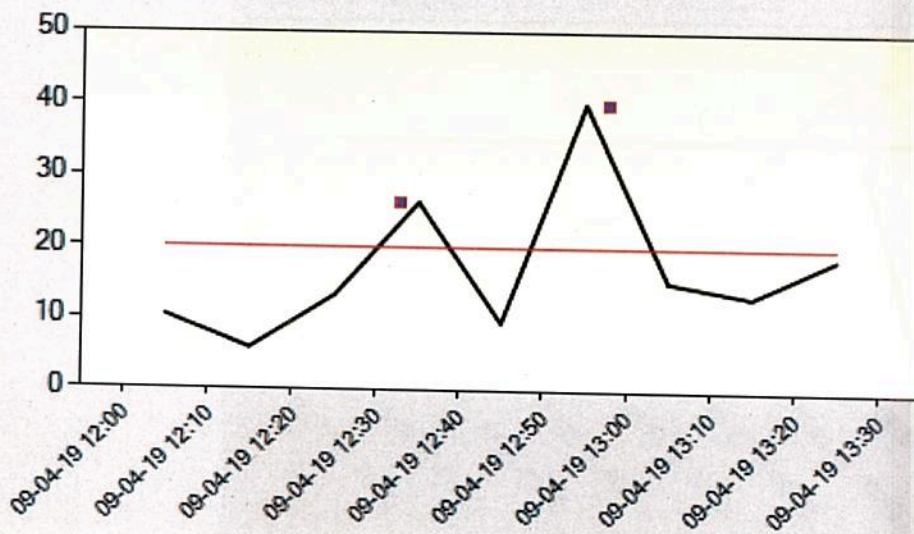
CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

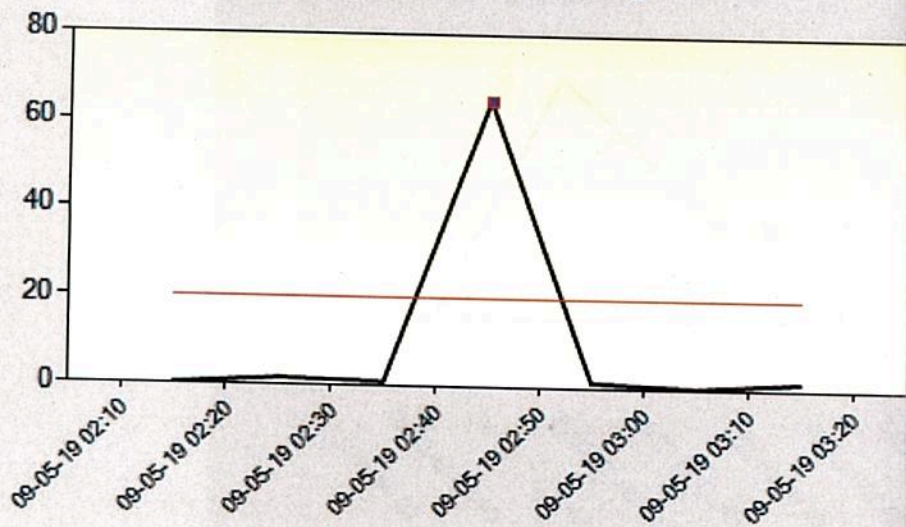
CO-6 N Dryer, 9/4/2019, 12:35- 13:05; Pulled and cleaned probe

AI6625C-CO6 N Dryr Stack Par Avg



CO-3B Purge Filter, 9/5/2019, 2:45- 2:55; Sudden spike; trended down.

AI3814F-CO3B Purg Filt Part Avg





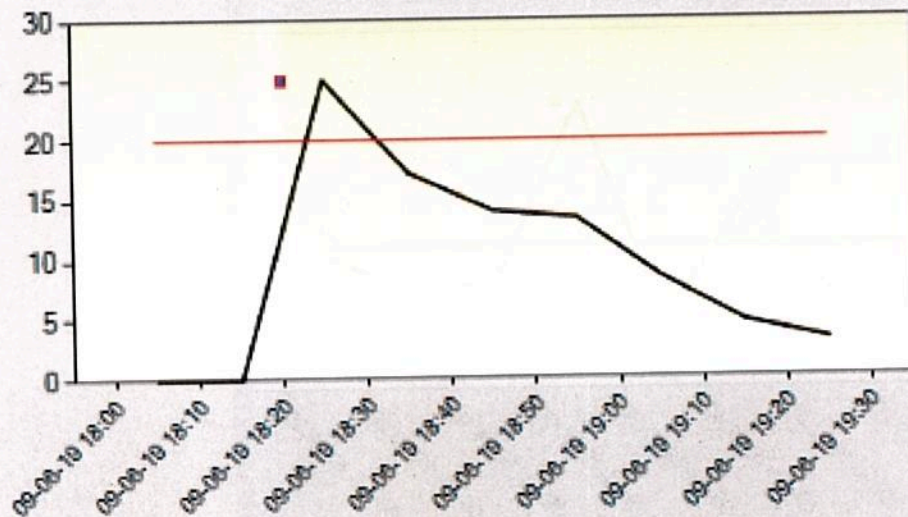
CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

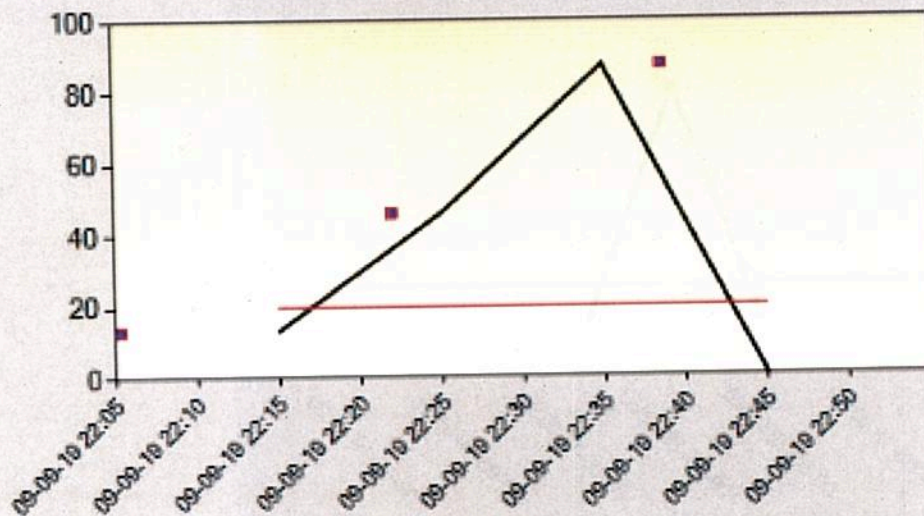
CS-2 Dryer, 9/6/2019, 18:25- 18:35; Sudden spike; trended down.

AI2625C-CS2 Dryr Stack Part Avg



CO-3A Purge Filter, 9/9/2019, 22:25- 22:45; Pulled and cleaned probe; moisture on probe.

AI3614F-CO3A Purg Filt Part Avg

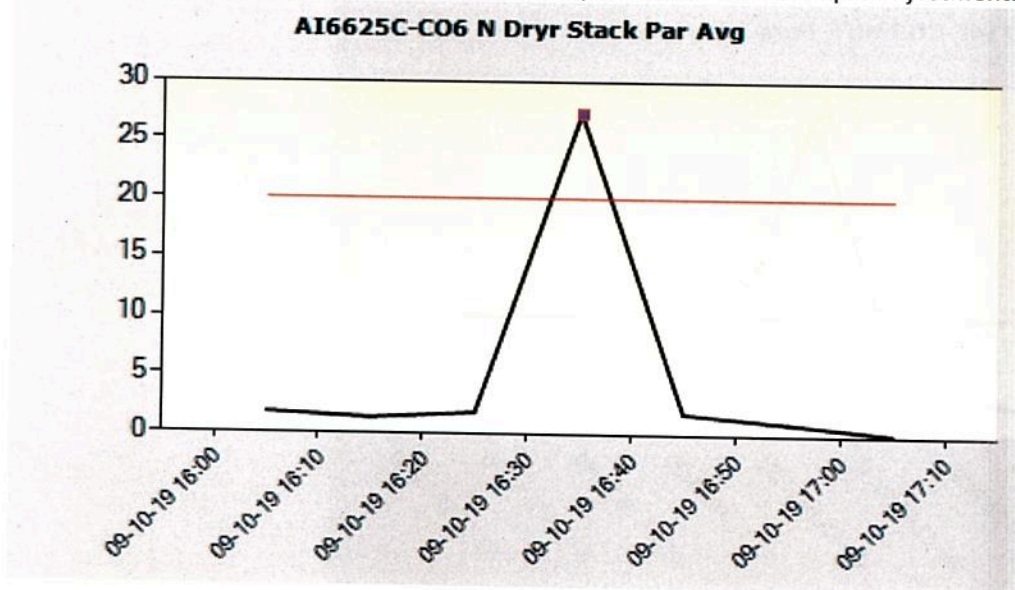


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

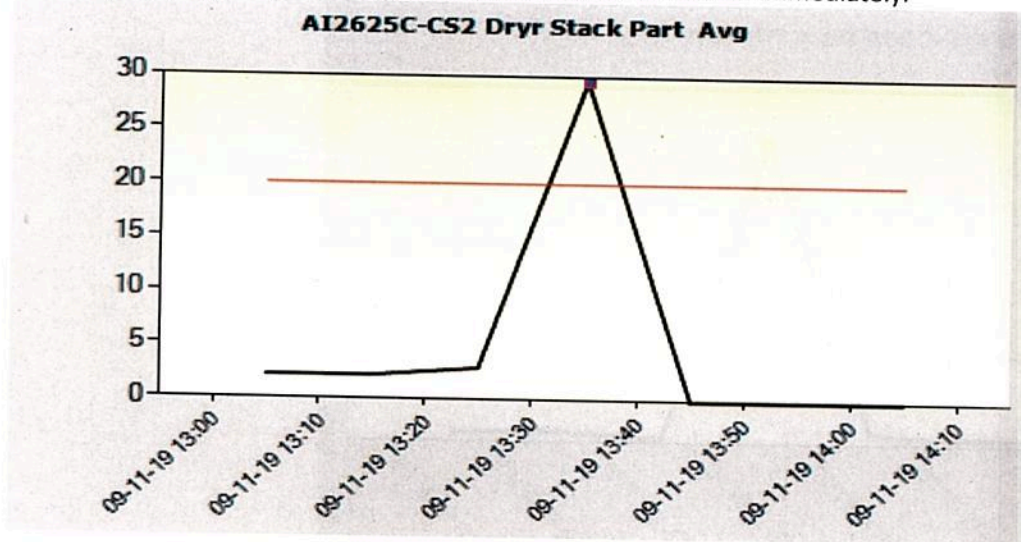
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-6 N Dryer, 9/10/2019, 16:35- 16:45; Sudden spike due to stack damper adjustments; trended down.



CS-2 Dryer, 9/11/2019, 13:35- 13:45; Dryer leak; shut unit down immediately.

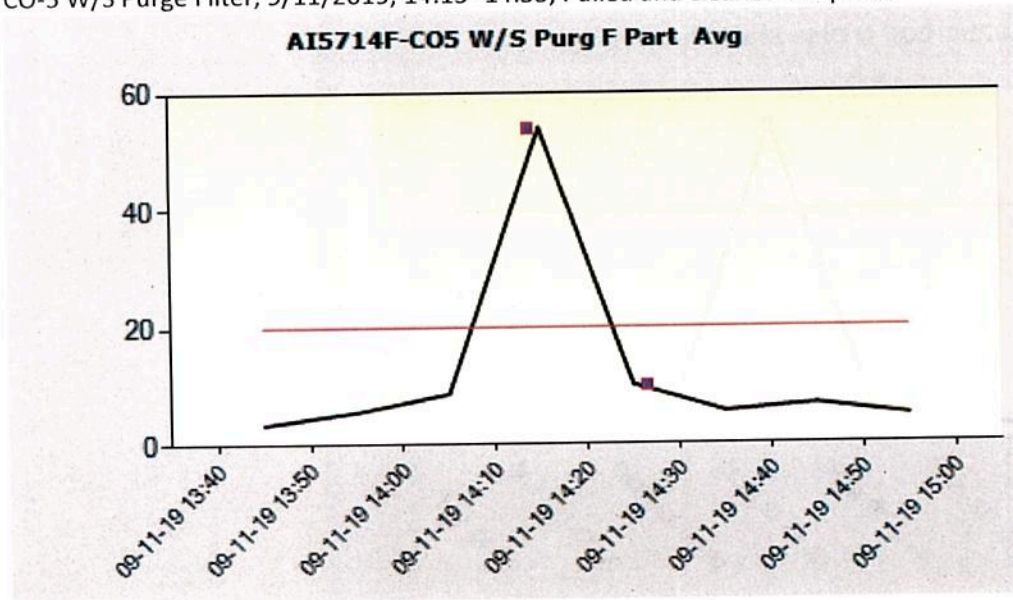


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

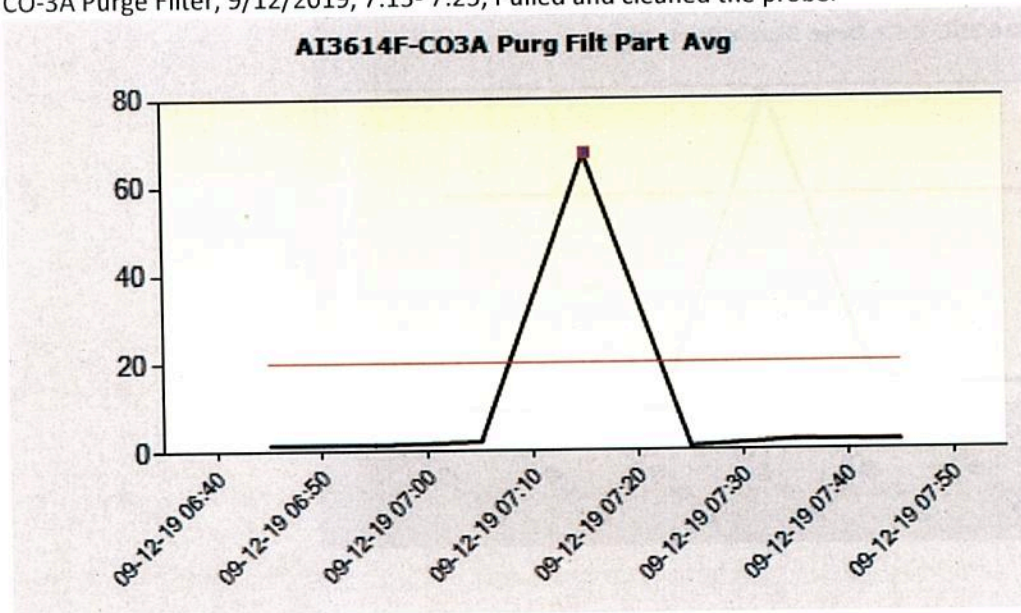
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-5 W/S Purge Filter, 9/11/2019, 14:15- 14:35; Pulled and cleaned the probe.



CO-3A Purge Filter, 9/12/2019, 7:15- 7:25; Pulled and cleaned the probe.



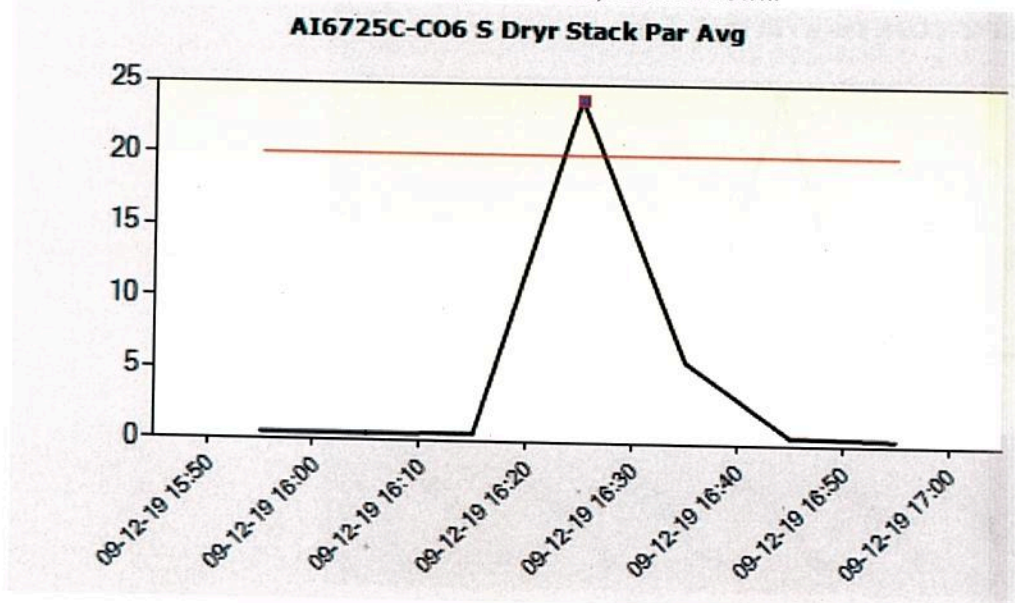


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

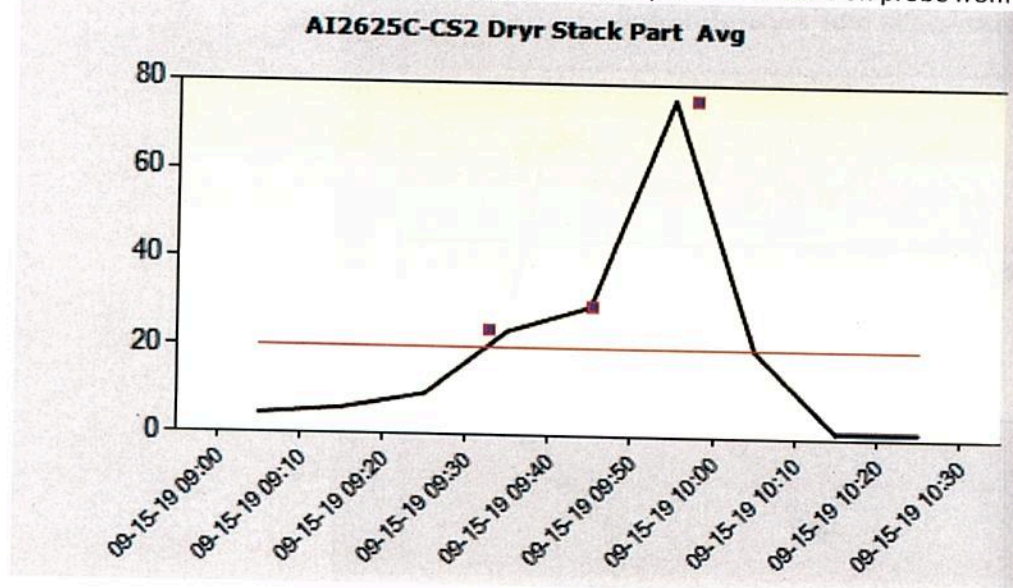
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-6 S Dryer, 9/12/2019, 16:25- 16:35; Rain event; trended down.



CS-2 Dryer, 9/15/2019, 9:35- 10:05; Grade change; suspected moisture on probe from low dryer temperature.



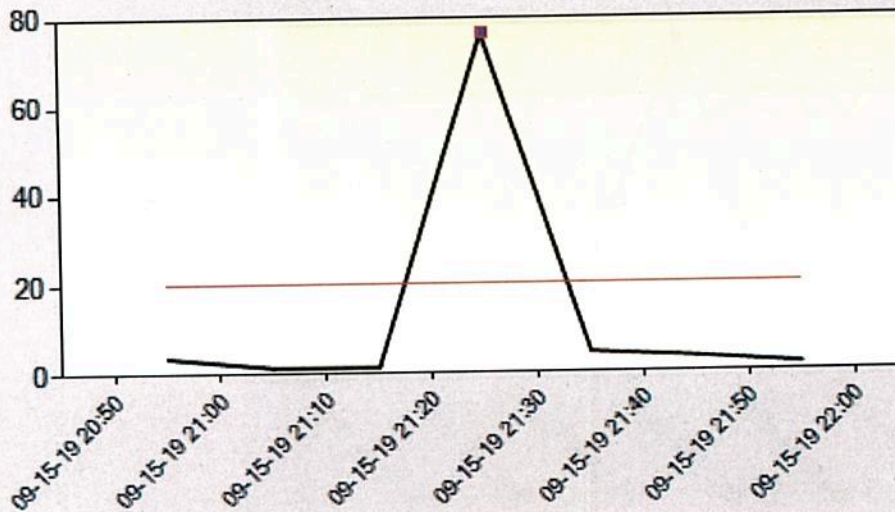
CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

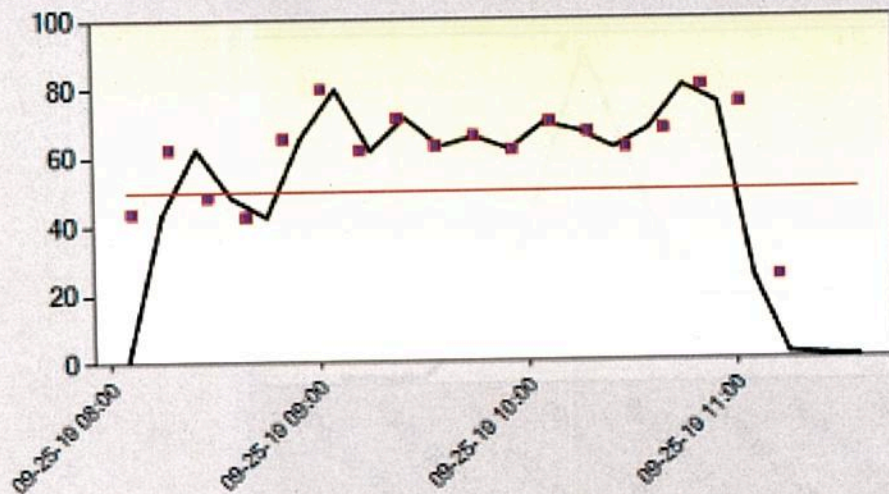
CO-3A Purge Filter, 9/15/2019, 21:25- 21:35; Pulled and cleaned the probe after plugging the filter.

AI3614F-CO3A Purg Filt Part Avg



CO-3A MUF, 9/25/2019, 8:25- 11:05; Filter leak; unit was taken down for maintenance.

KI3414D-CO3A MUF Particult M Avg

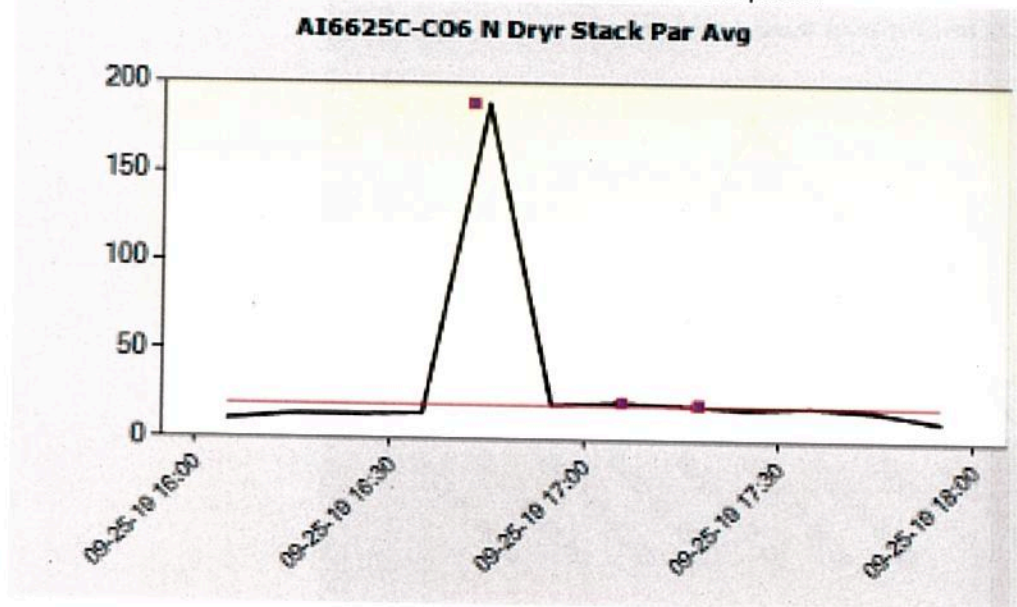


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

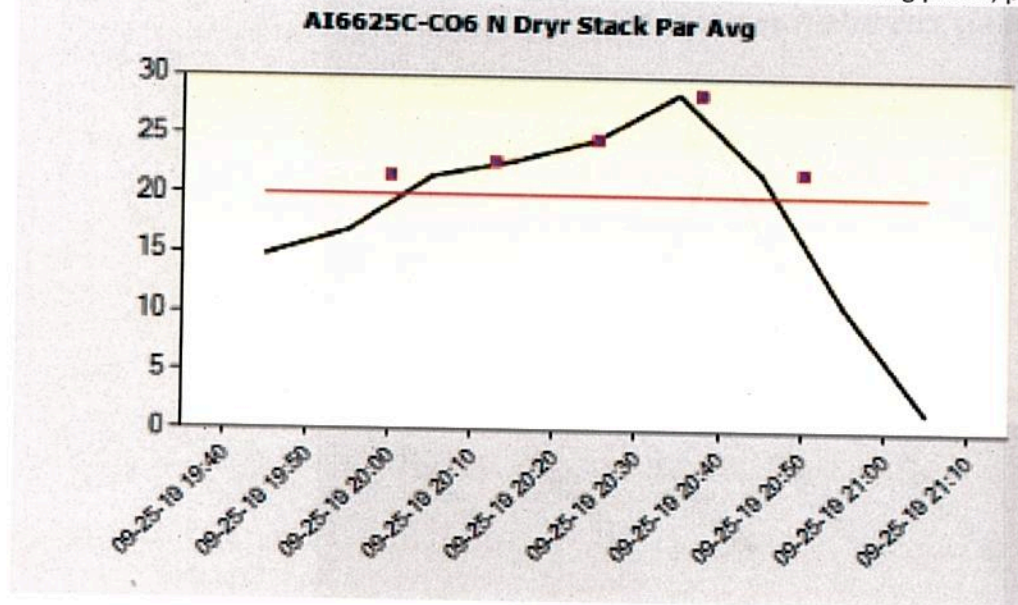
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-6 N Dryer, 9/25/2019, 16:45- 17:25; Pulled and cleaned the probe.



CO-6 N Dryer, 9/25/2019, 20:05- 20:55; Technical difficulties; troubleshooting probe; purge air had rust in it.



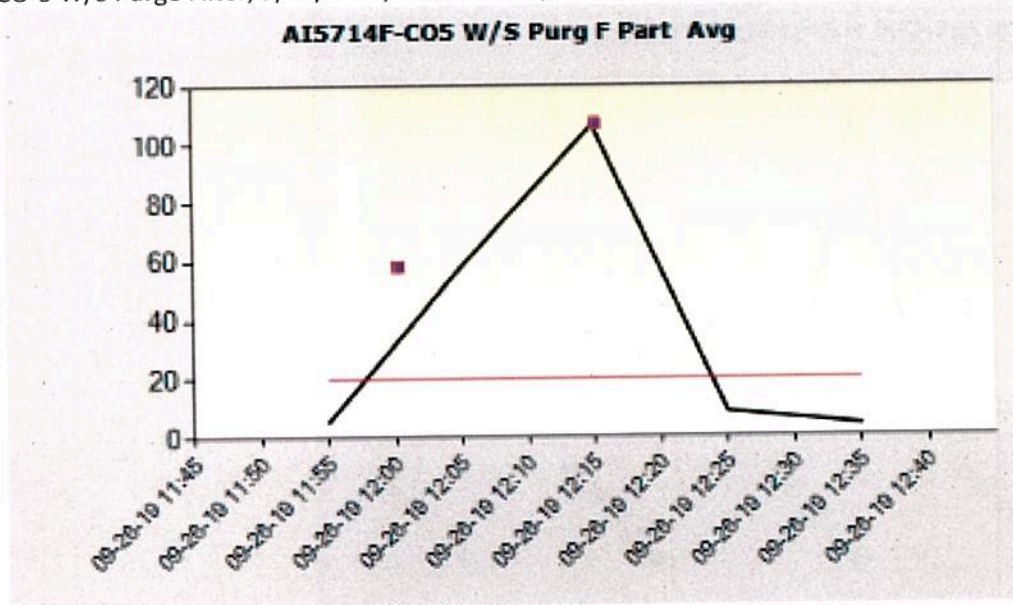


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

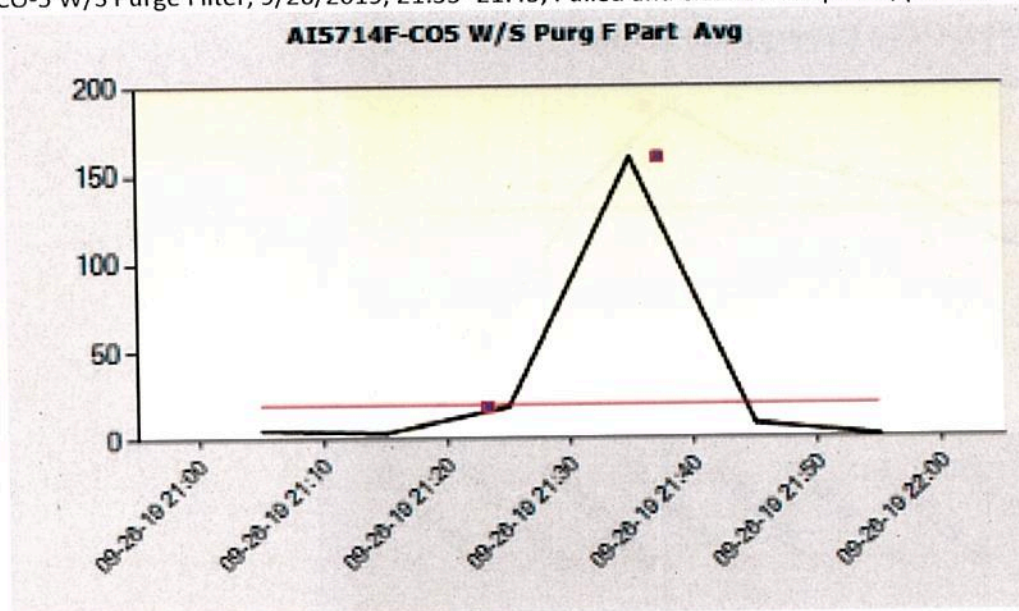
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-5 W/S Purge Filter, 9/26/2019, 12:05- 12:25; Pulled and cleaned probe; possible filter leak.



CO-5 W/S Purge Filter, 9/26/2019, 21:35- 21:45; Pulled and cleaned the probe; possible filter leak.

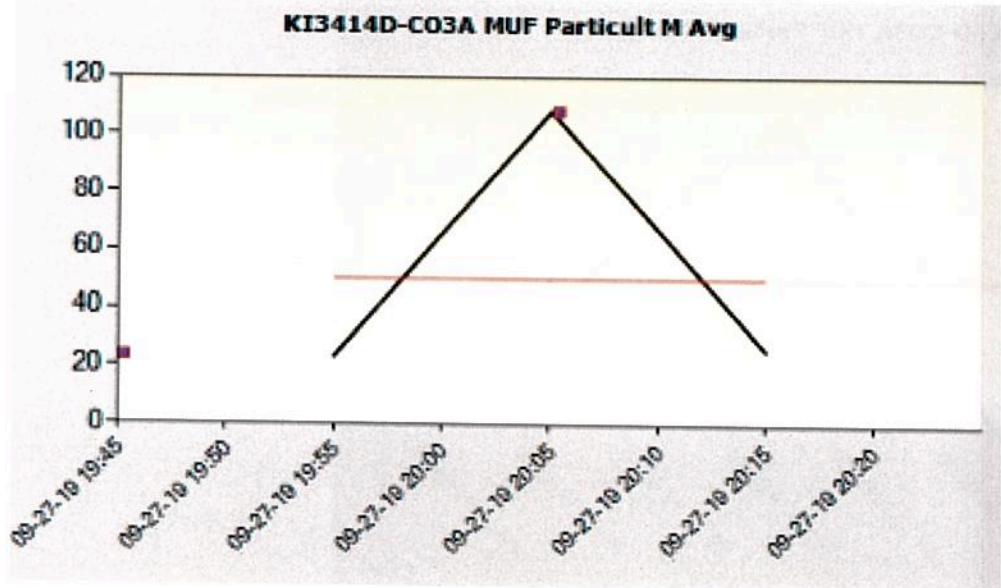


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

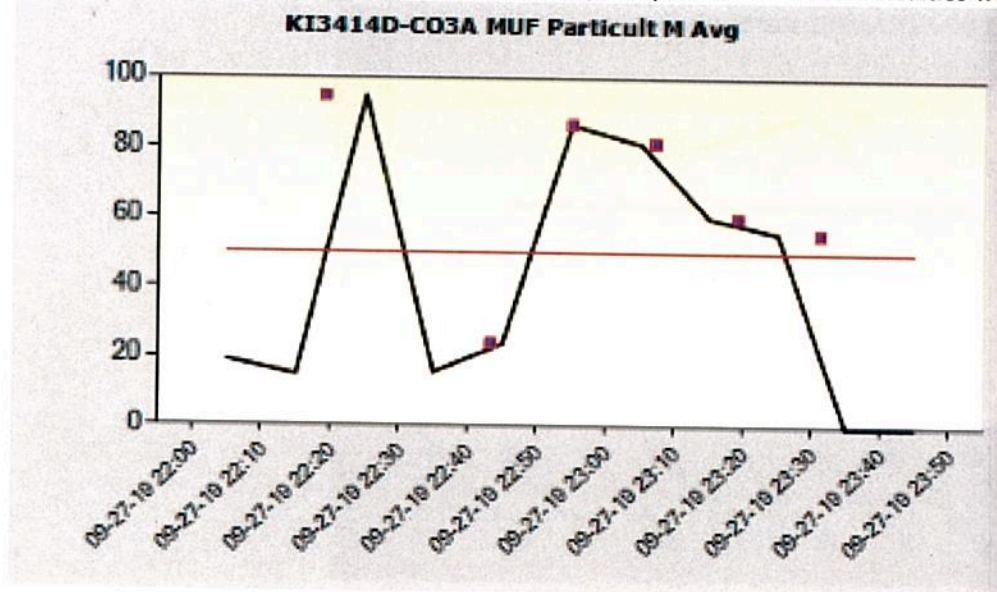
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A MUF, 9/27/2019, 20:05- 20:15; Pulled and cleaned the probe.



CO-3A MUF, 9/27/2019, 22:25- 22:35; Unit start-up; suspected technical difficulties with probe; troubleshooting probe.

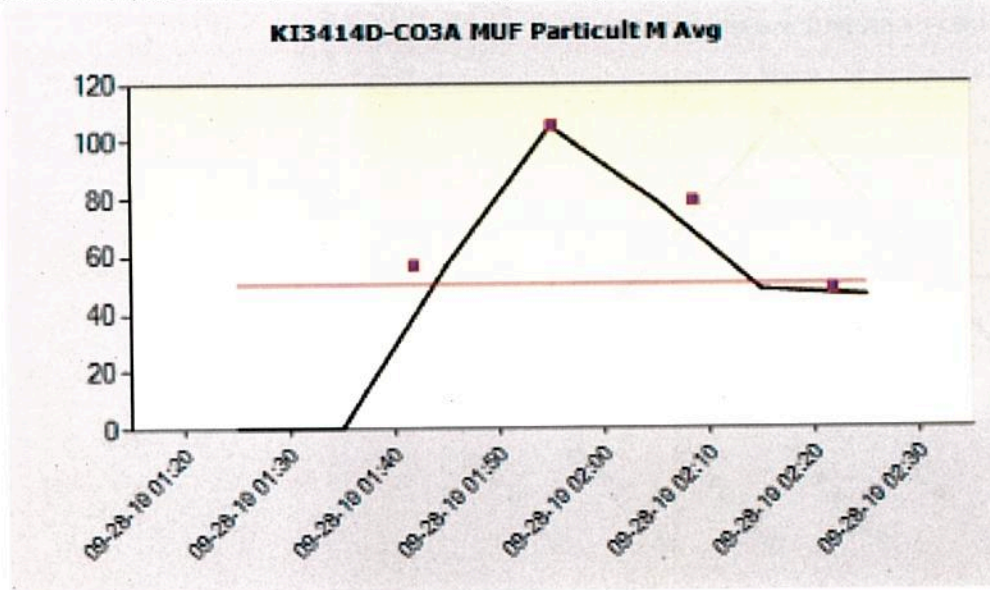


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

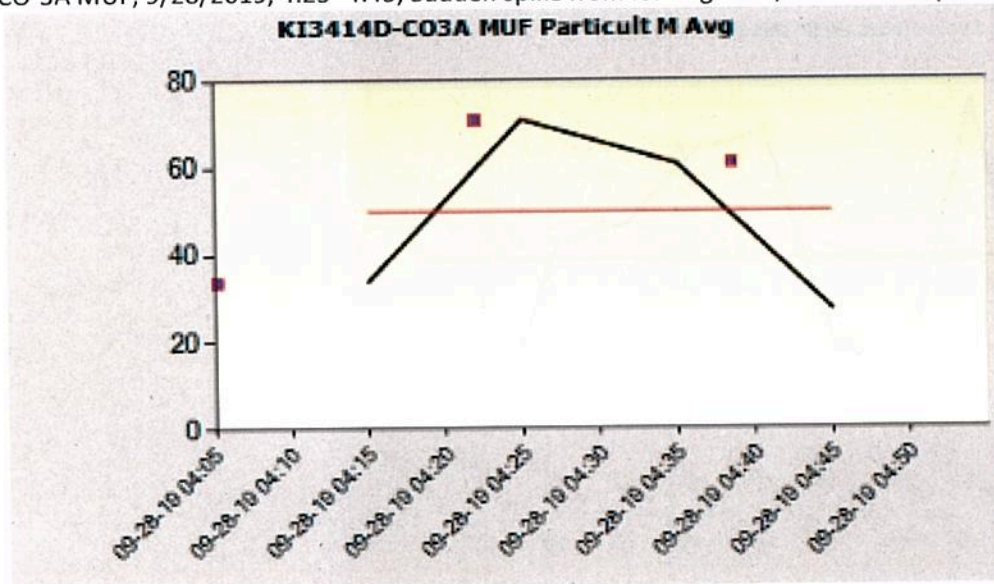
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A MUF, 9/28/2019, 1:45- 2:15; Start-up; leaking filter; isolated compartment and lower rate.



CO-3A MUF, 9/28/2019, 4:25- 4:45; Sudden spike from leaking filter; isolated compartment; reduced repressuring fan.



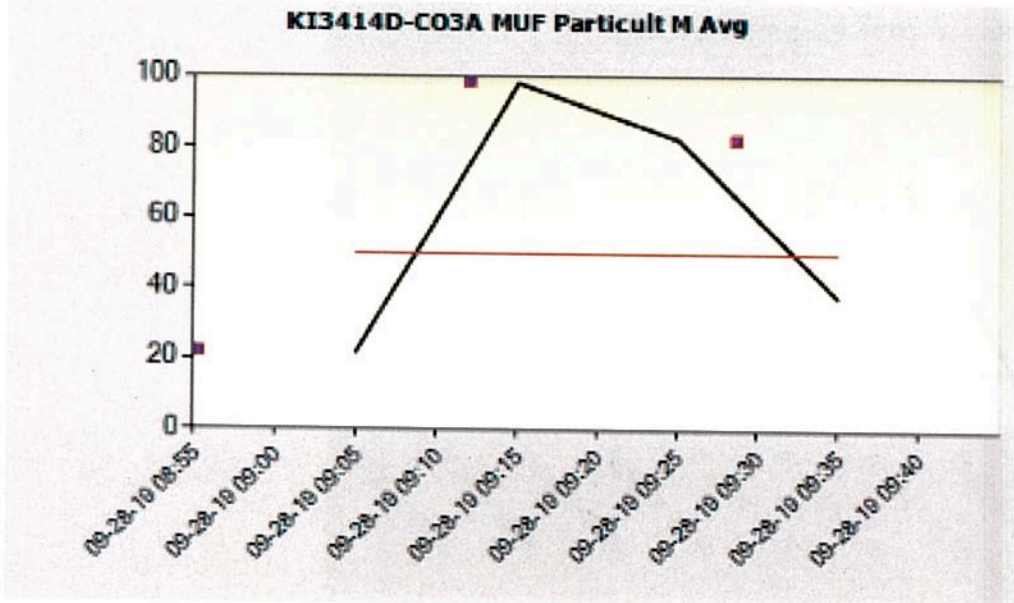


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

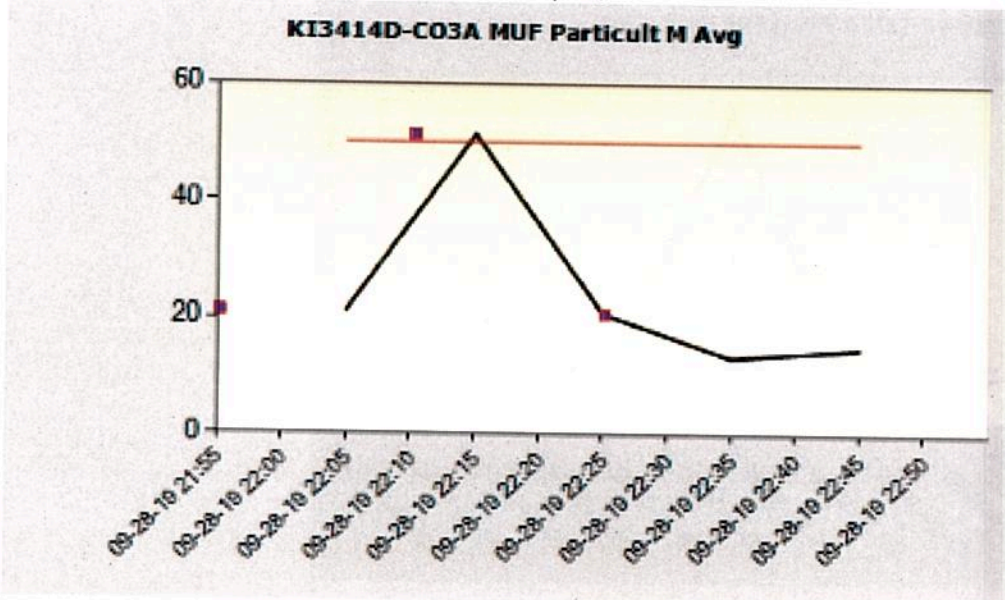
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A MUF, 9/28/2019, 9:15- 9:35; Sudden spike; trended down.



CO-3A MUF, 9/28/2019, 22:15- 22:25; Sudden spike; trended down.

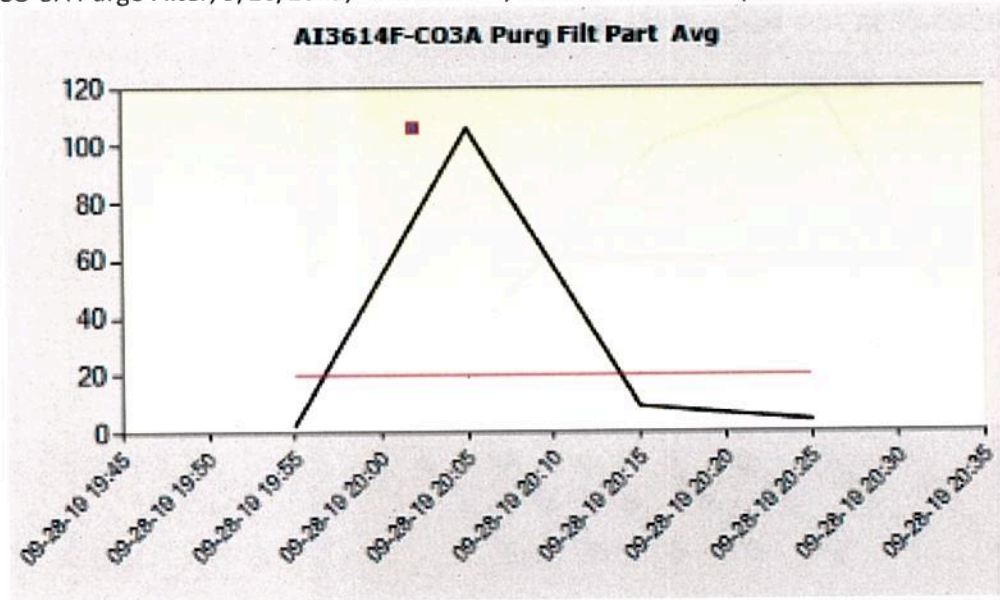


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

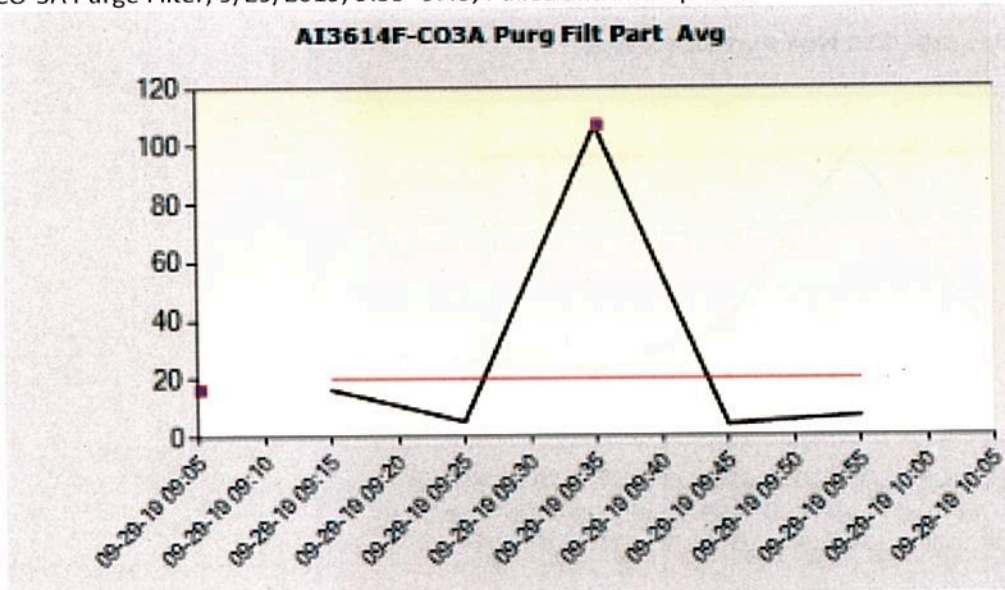
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A Purge Filter, 9/28/2019, 20:05- 20:15; Pulled and cleaned probe.



CO-3A Purge Filter, 9/29/2019, 9:35- 9:45; Pulled and clean probe.

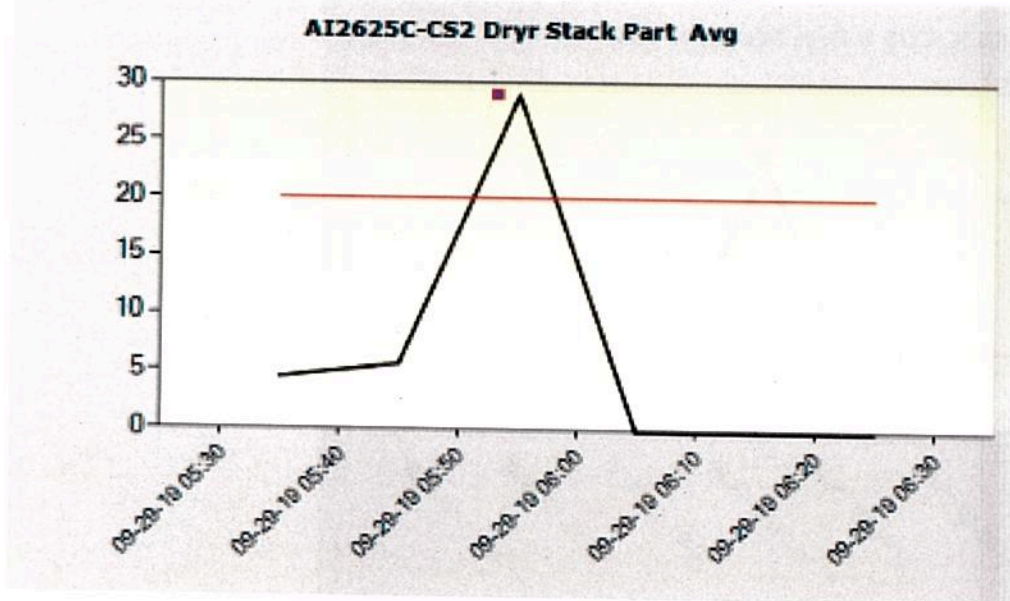


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

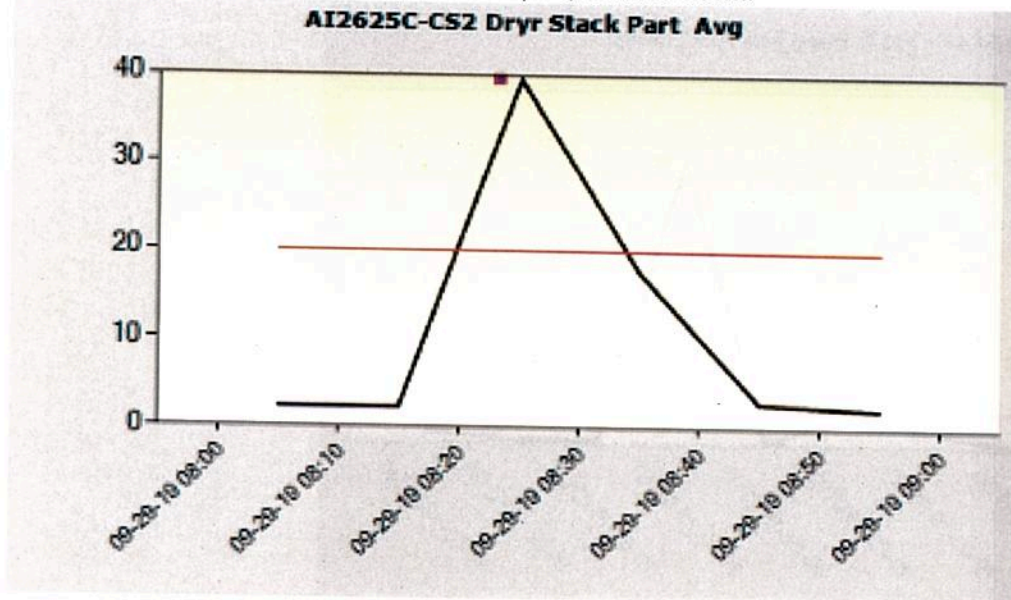
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CS-2 Dryer, 9/29/2019, 5:55- 6:05; Sudden spike; trended down.



CS-2 Dryer, 9/29/2019, 8:25- 8:35; Sudden spike; trended down.



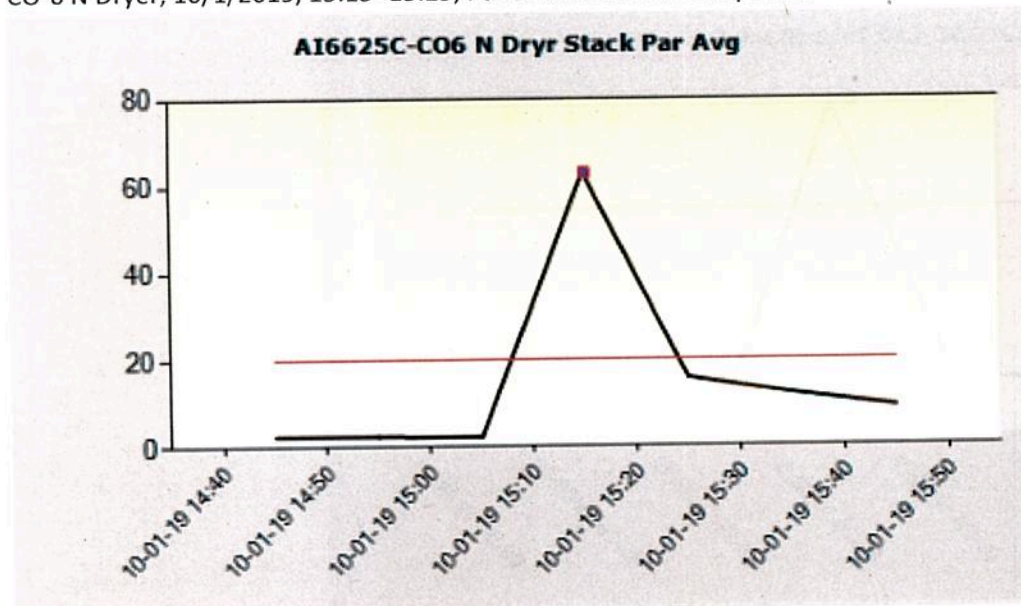


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

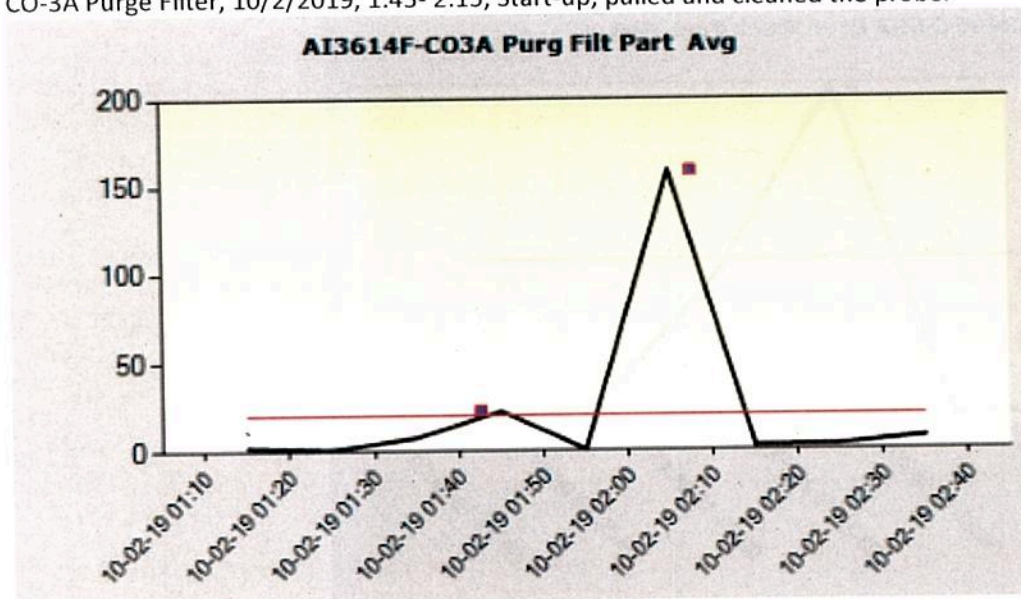
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-6 N Dryer, 10/1/2019, 15:15- 15:25; Pulled and cleaned the probe.



CO-3A Purge Filter, 10/2/2019, 1:45- 2:15; Start-up; pulled and cleaned the probe.

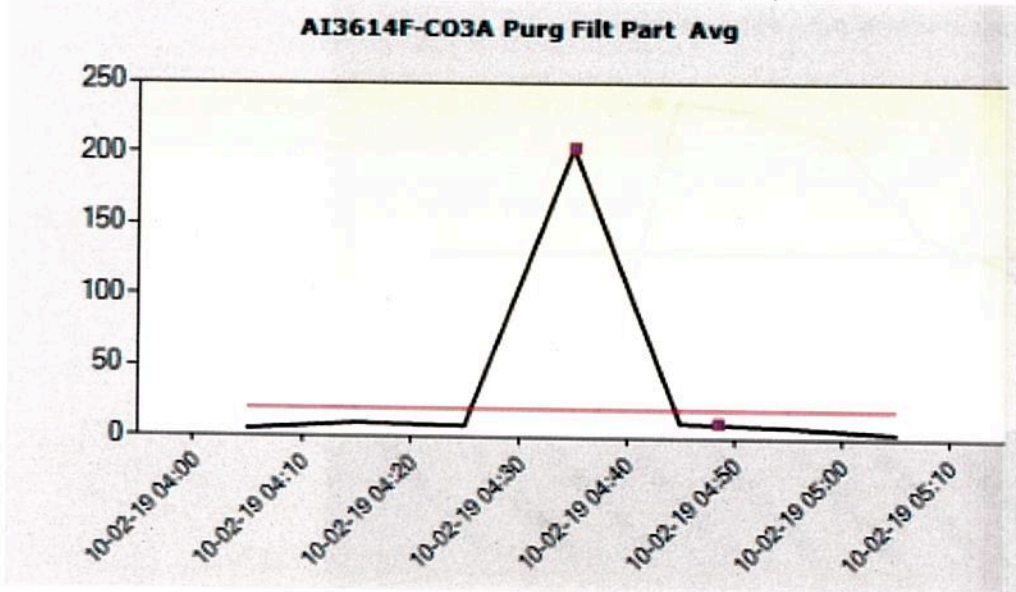


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

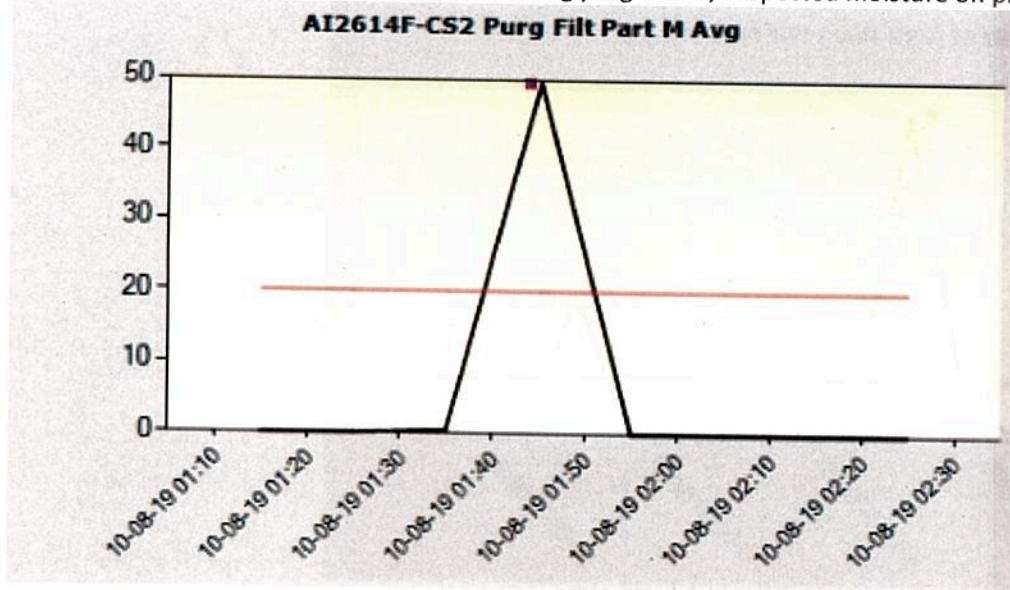
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A Purge Filter, 10/2/2019, 4:35- 4:45; Pulled and cleaned the probe.



CS-2 Purge Filter, 10/8/2019, 1:45- 1:55; Heating purge filter; suspected moisture on probe; trended down.

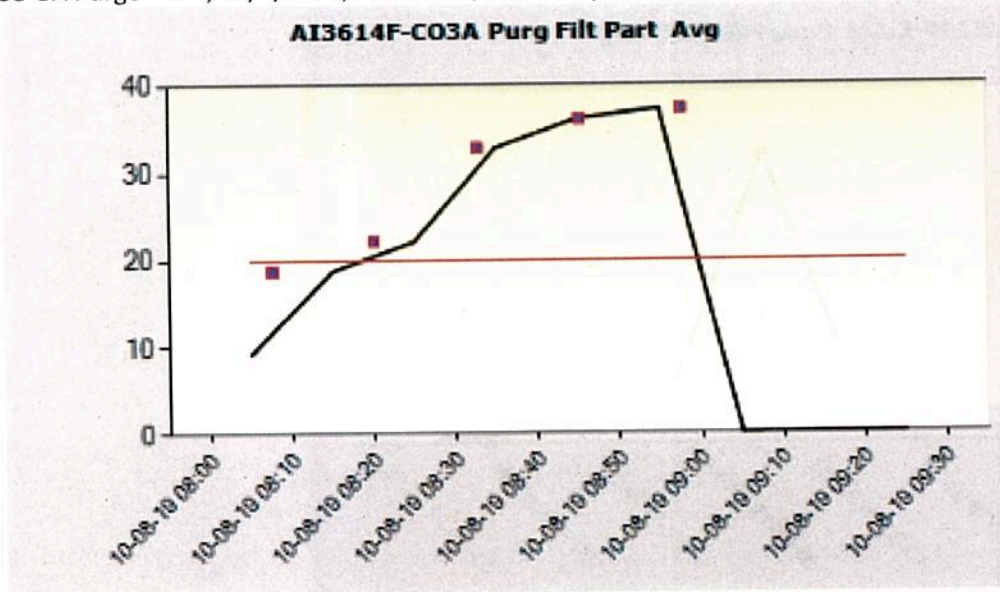


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

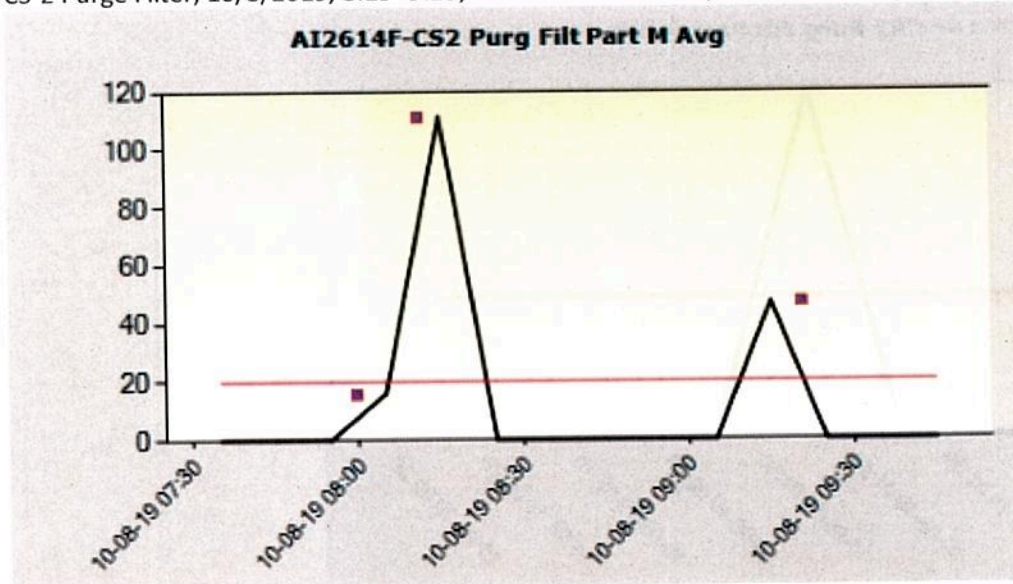
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A Purge Filter, 10/8/2019, 8:25- 9:05; Sudden spike; suspected moisture on probe; pulled and cleaned probe.



CS-2 Purge Filter, 10/8/2019, 8:15- 9:25; Technical difficulties; troubleshooting/repairing probe.



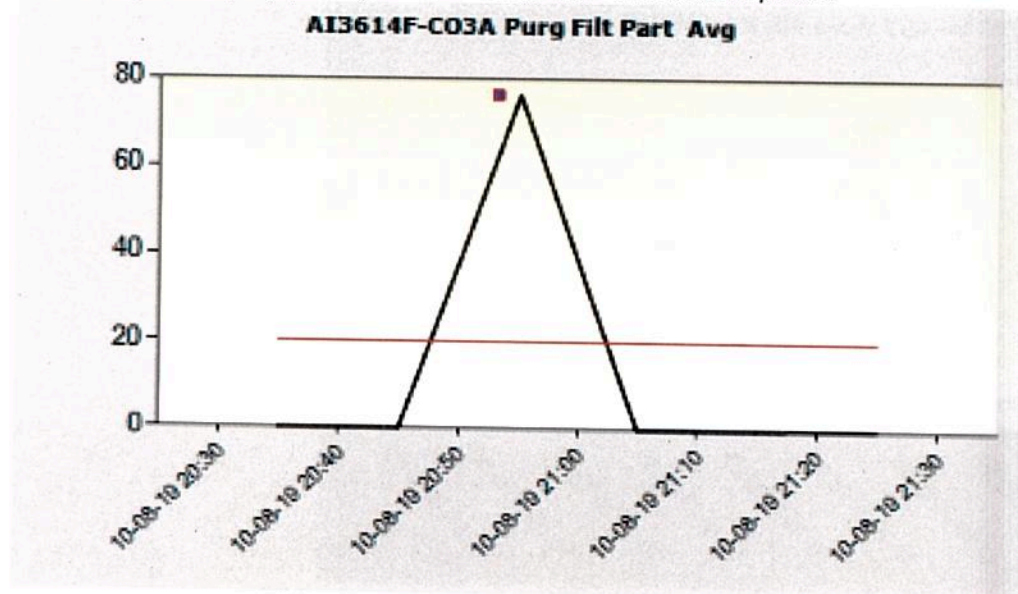


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

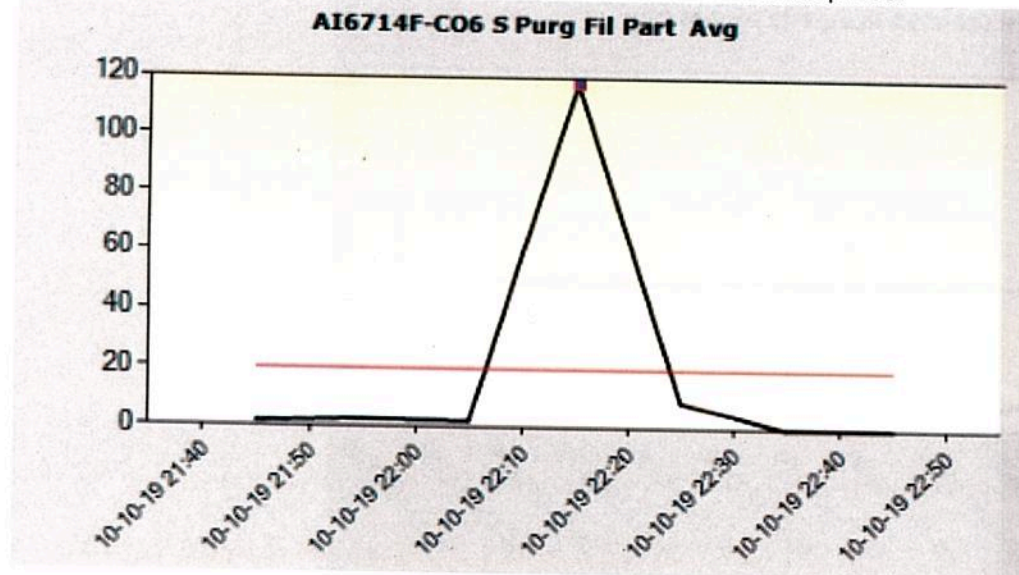
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A Purge Filter, 10/8/2019, 20:55- 21:05; Pulled and cleaned probe.



CO-6 S Purge Filter, 10/10/2019, 22:15- 22:25; Pulled and cleaned the probe.

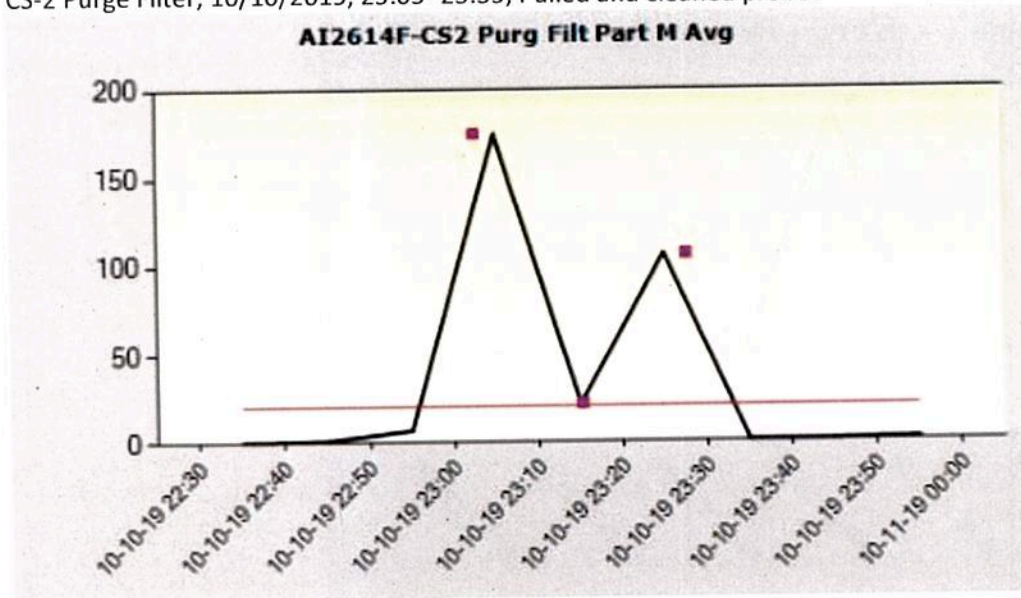


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

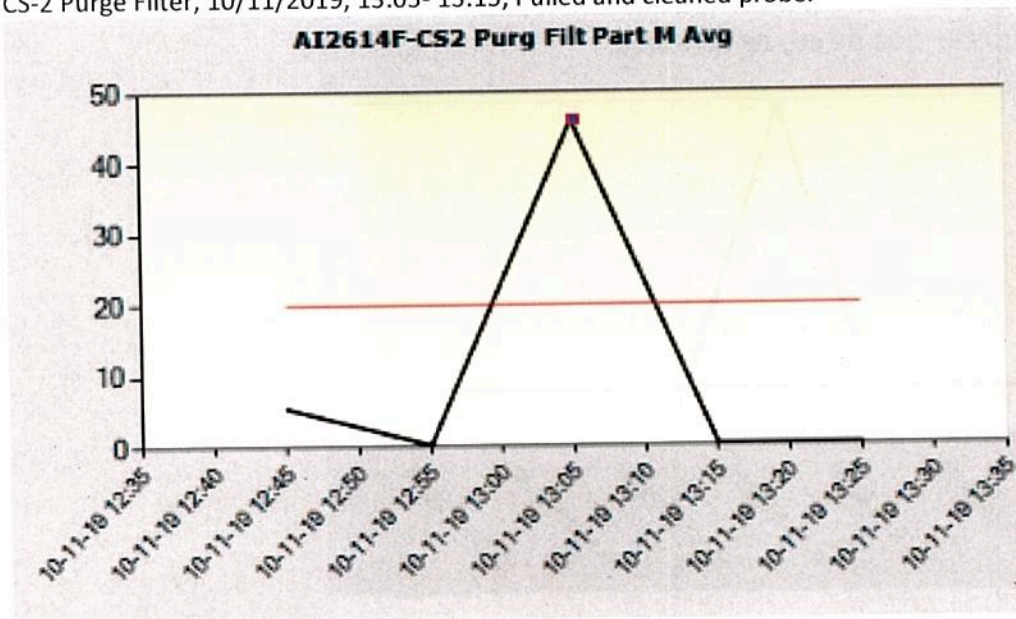
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CS-2 Purge Filter; 10/10/2019, 23:05- 23:35; Pulled and cleaned probe.



CS-2 Purge Filter, 10/11/2019, 13:05- 13:15; Pulled and cleaned probe.

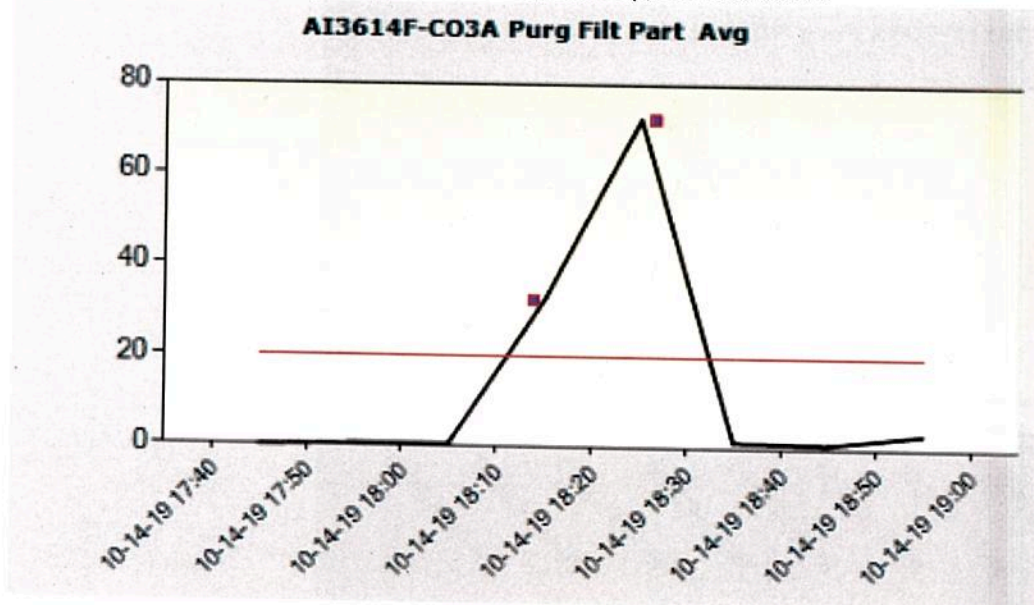


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

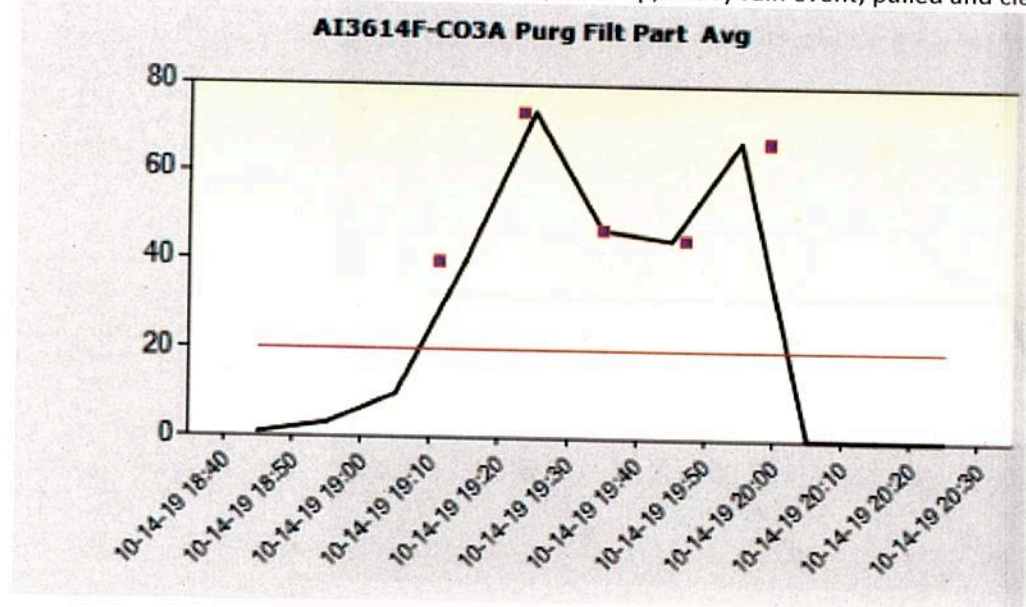
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A Purge Filter, 10/14/2019, 18:15- 18:35; Start-up; trended down.



CO-3A Purge Filter, 10/14/2019, 19:15- 20:05; Start-up; heavy rain event; pulled and cleaned probe; trended down.



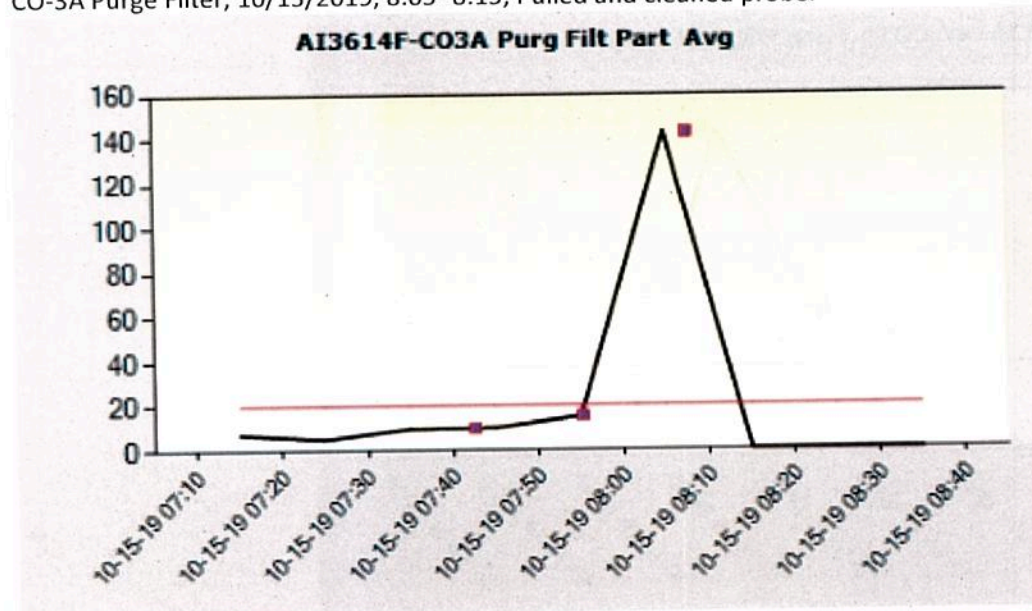


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

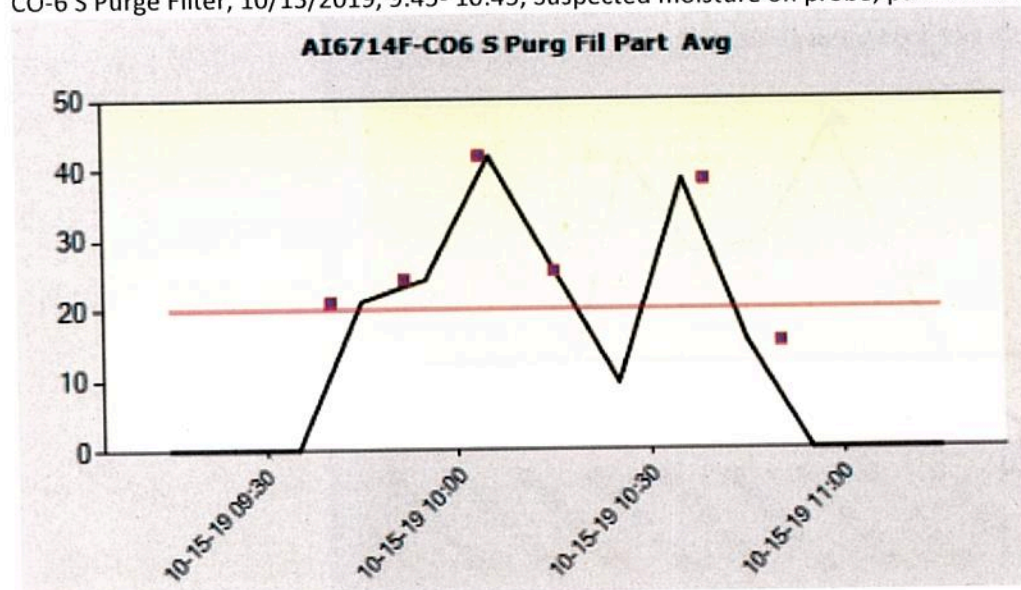
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A Purge Filter, 10/15/2019, 8:05- 8:15; Pulled and cleaned probe.



CO-6 S Purge Filter, 10/15/2019, 9:45- 10:45; Suspected moisture on probe; pulled and cleaned probe.

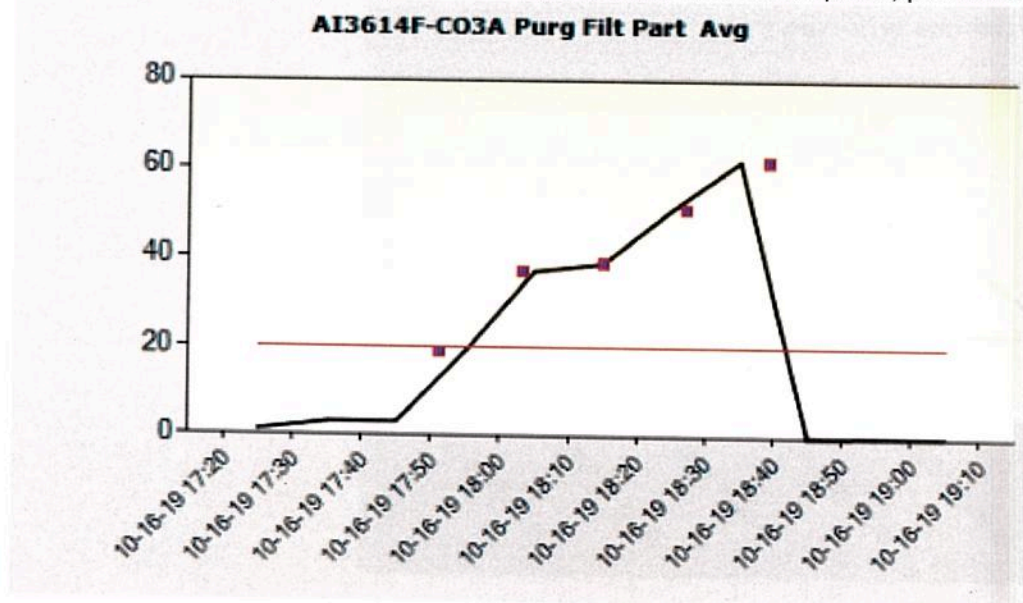


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

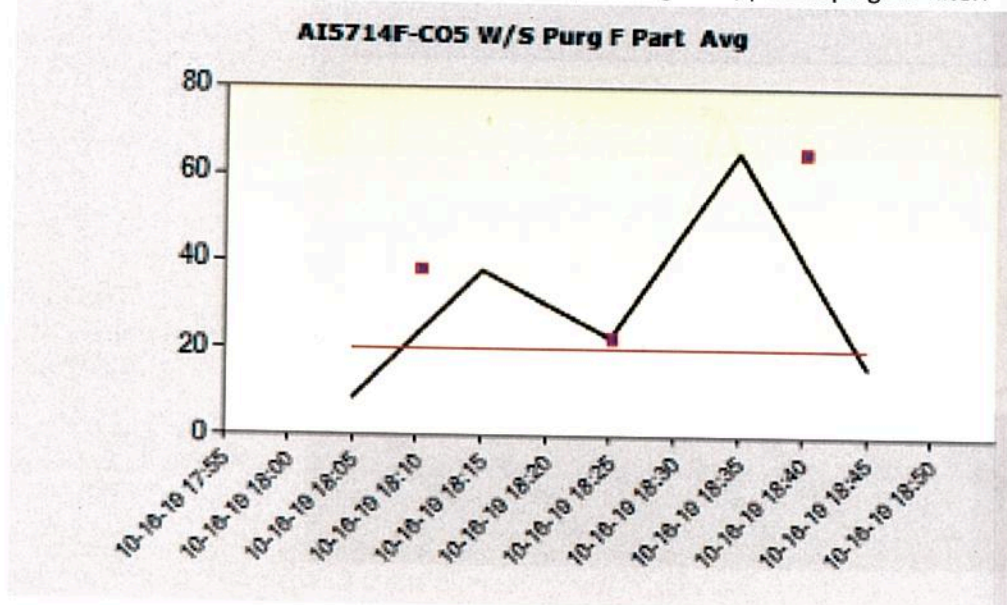
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A Purge Filter, 10/16/2019, 18:05- 18:45; Suspected moisture on probe; pulled and cleaned probe.



CO-5 W/S Purge Filter, 10/16/2019, 18:15- 18:45; Leaking filter; placed plugs in filter.

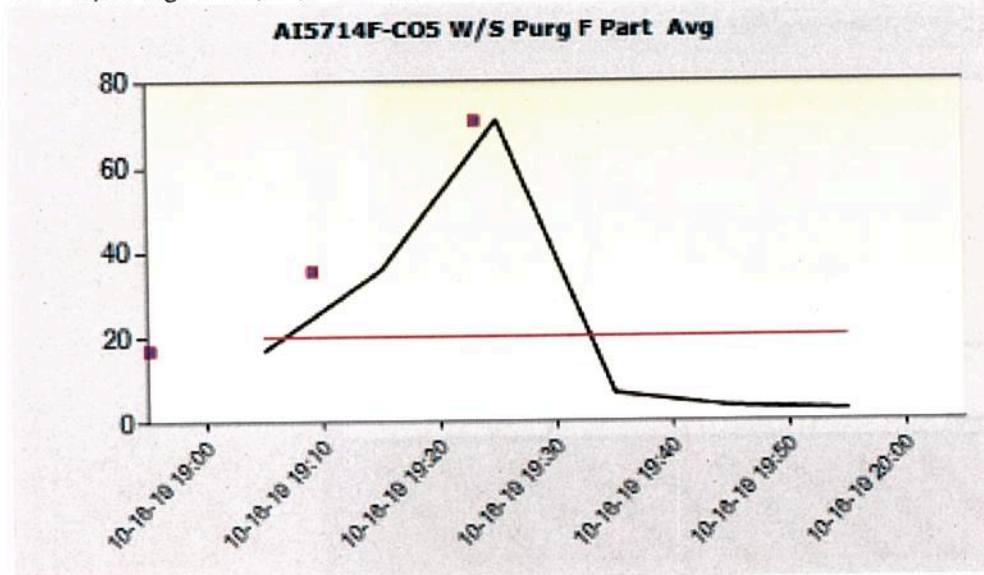


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

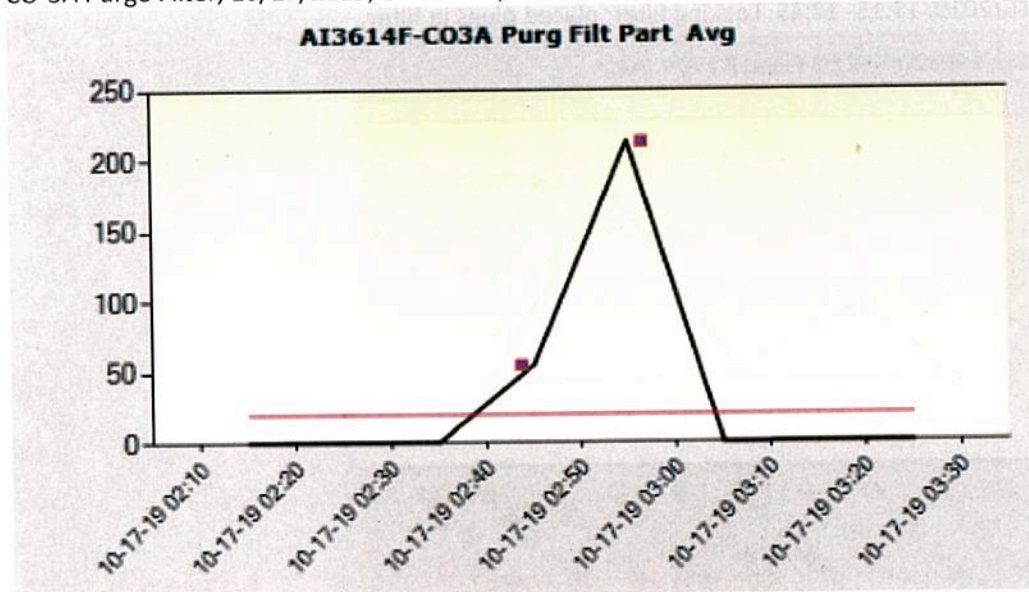
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-5 W/S Purge Filter, 10/16/2019, 19:15- 19:35; Leaking filter; pulled and cleaned probe.



CO-3A Purge Filter, 10/17/2019, 2:45- 3:05; Technical difficulties; troubleshooting/repairing probe.



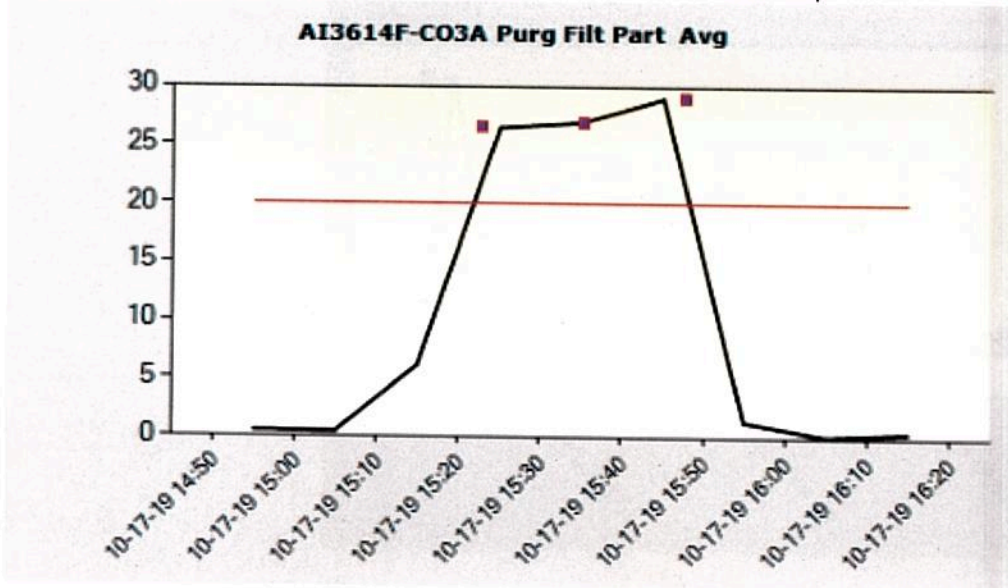


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

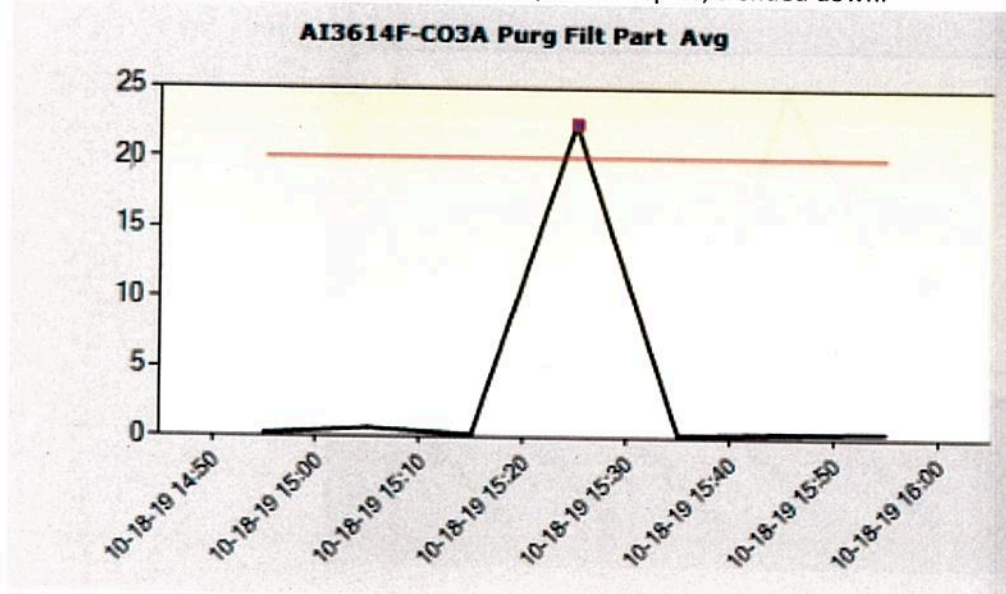
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A Purge Filter, 10/17/2019, 15:25- 15:55; Pulled and cleaned the probe.



CO-3A Purge Filter, 10/18/2019, 15:25- 15:35; Sudden spike; trended down.

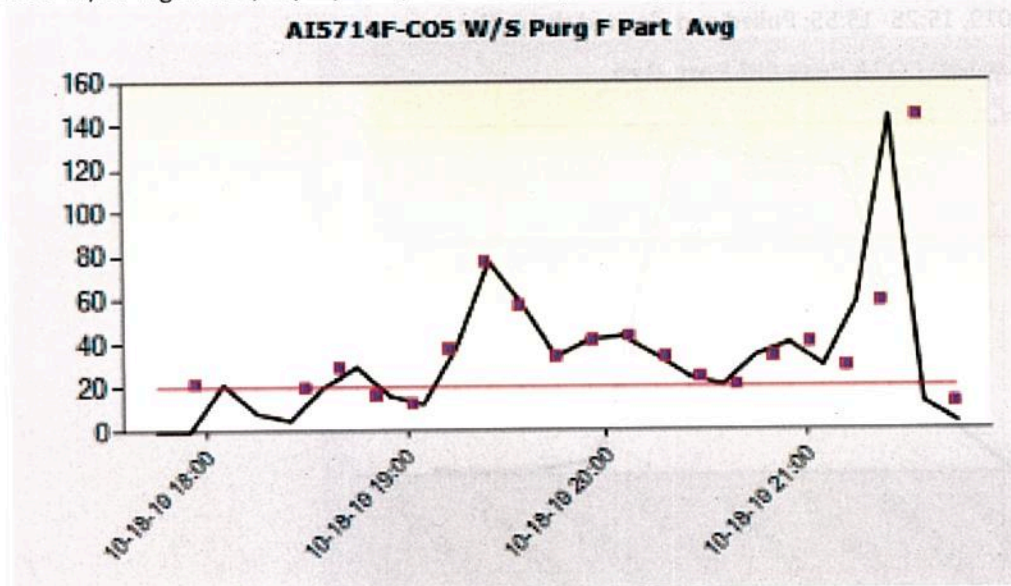


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

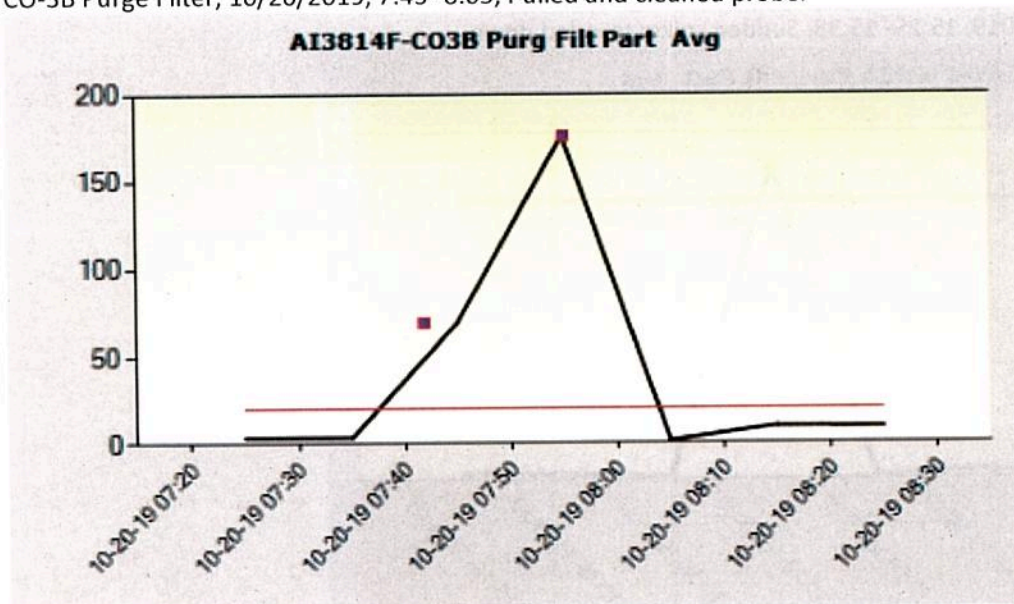
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-5 W/S Purge Filter, 10/18/2019, 18:05- 21:35; Start-up; leaking filter; plugged filter; pulled and cleaned probe.



CO-3B Purge Filter, 10/20/2019, 7:45- 8:05; Pulled and cleaned probe.

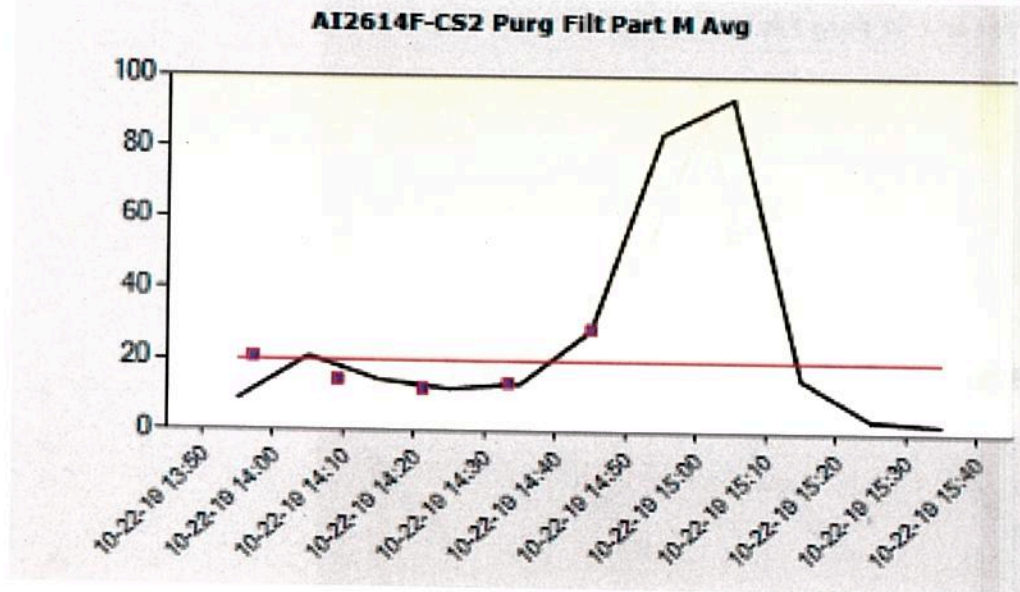


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

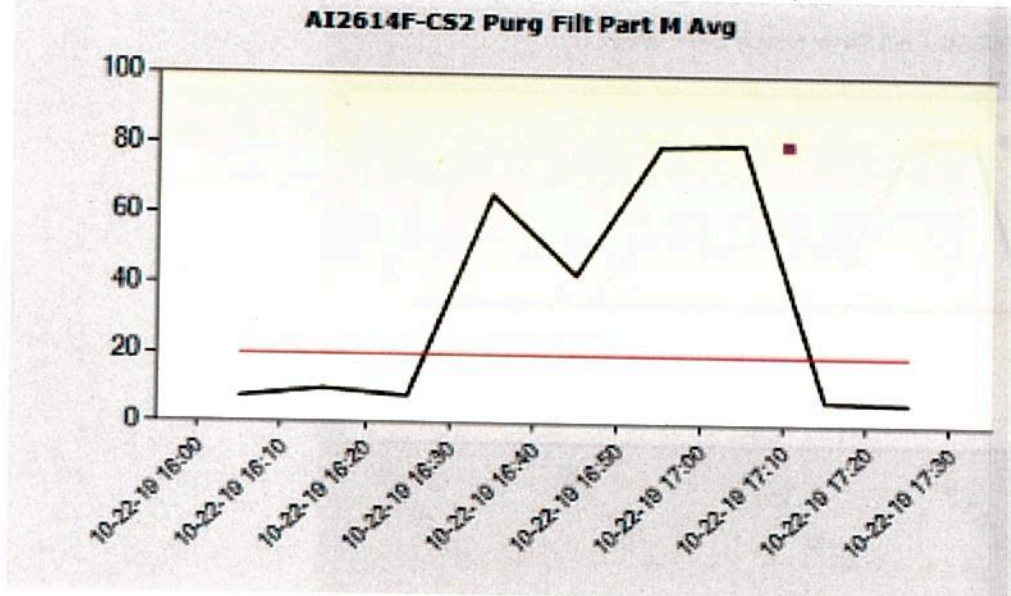
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CS-2 Purge Filter, 10/22/2019, 14:05- 15:15; Suspected moisture; pulled and cleaned the probe.



CS-2 Purge Filter, 10/22/2019, 16:35- 17:15; Pulled and cleaned the probe.





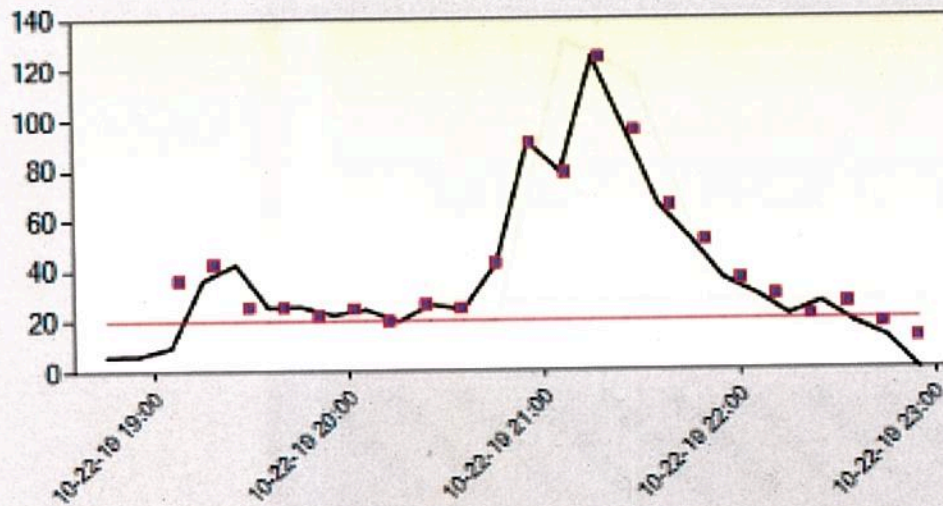
CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

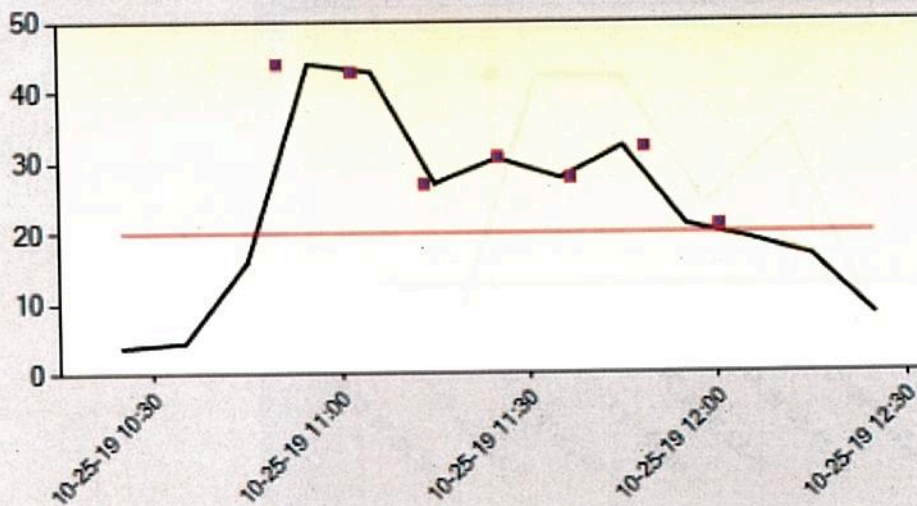
CS-2 Purge Filter, 10/22/2019, 19:15- 22:35; Pulled and cleaned the probe.

AI2614F-CS2 Purg Filt Part M Avg



CS-2 Dryer, 10/25/2019, 10:55- 12:05; Start-up; trended down.

AI2625C-CS2 Dryr Stack Part Avg

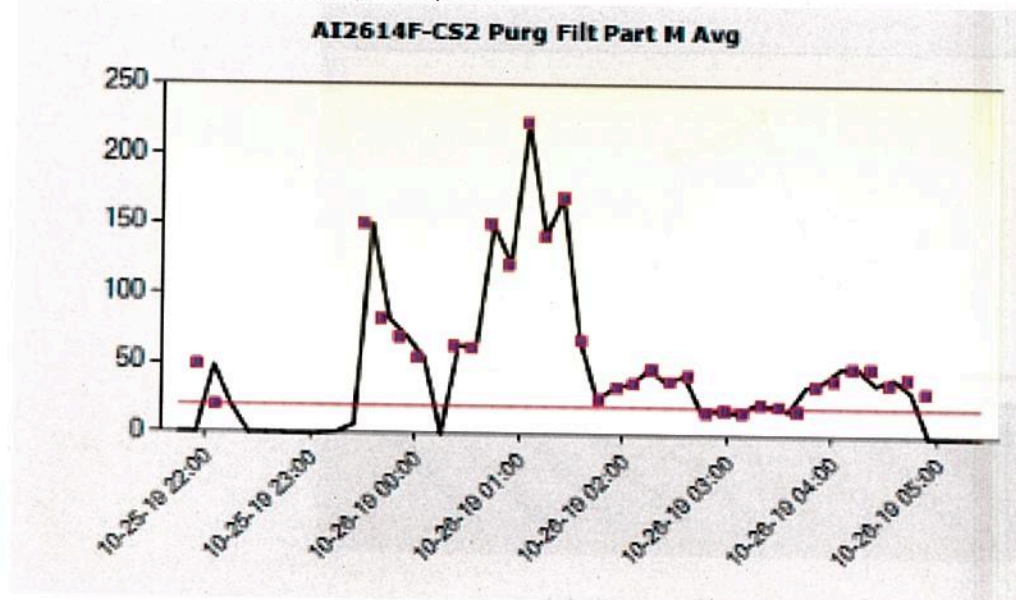


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

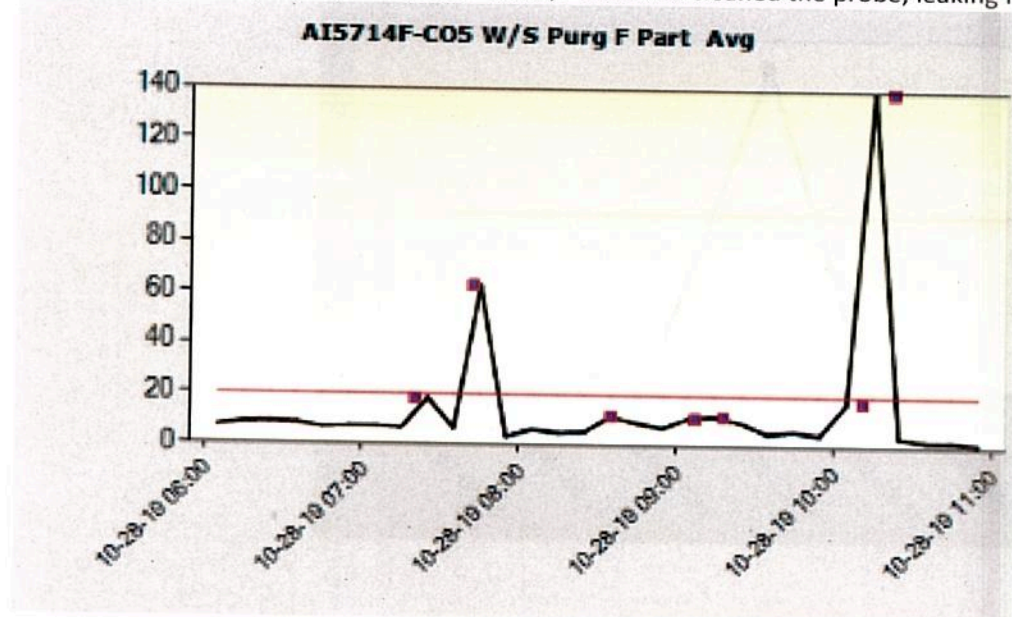
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CS-2 Purge Filter, 10/25/2019- 10/26/2019, 22:05- 4:55; Heavy rain event; suspected moisture on probe; pulled and cleaned probe; troubleshoot/repaired probe.



CO-5 W/S Purge Filter, 10/28/2019, 7:45- 10:25; Pulled and cleaned the probe; leaking filter, plugged filter.

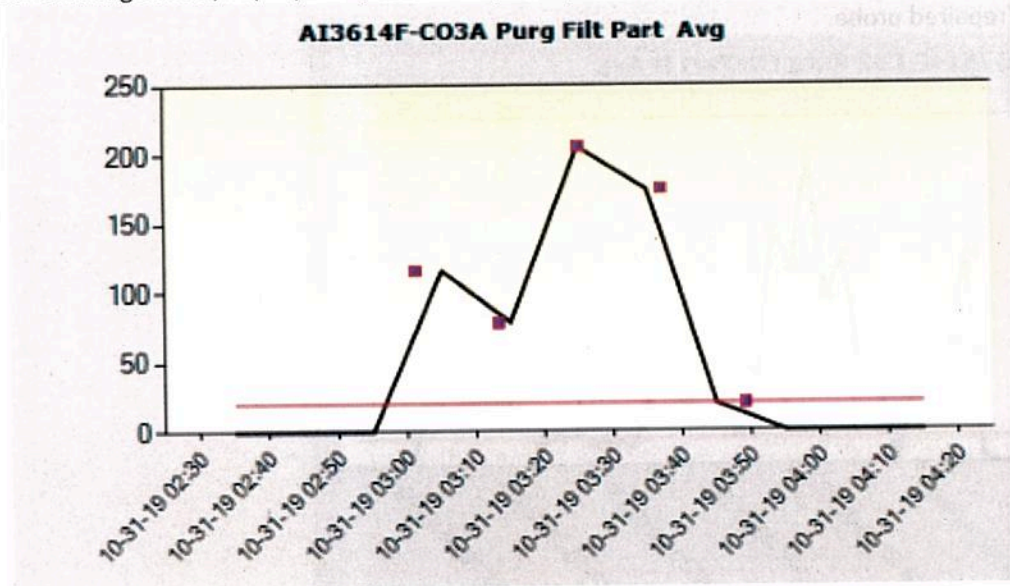


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

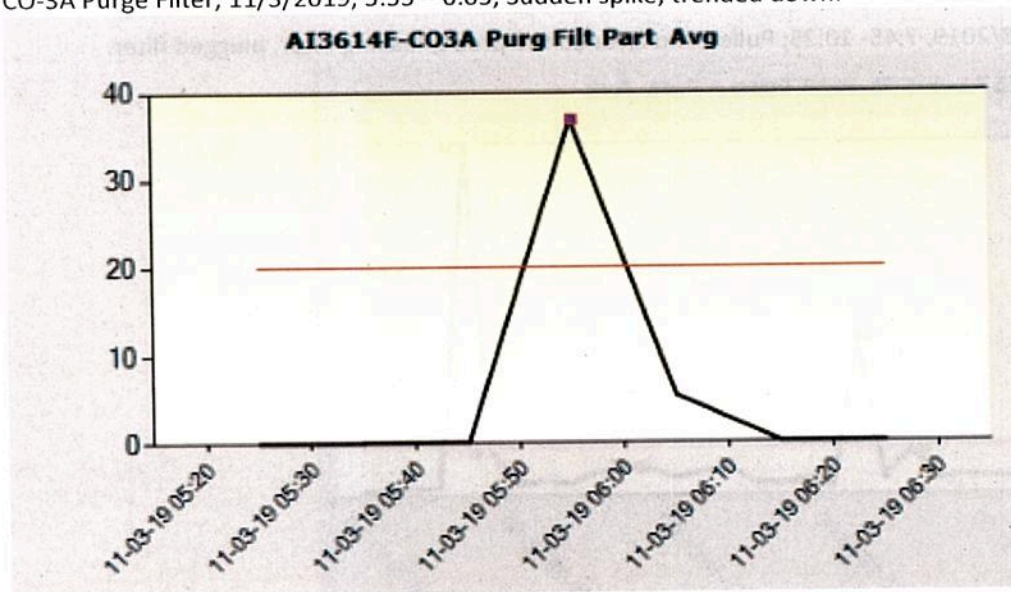
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A Purge Filter, 10/31/2019, 3:05- 3:45; Heavy rain event; pulled and cleaned probe; trended down.



CO-3A Purge Filter, 11/3/2019, 5:55 – 6:05; Sudden spike; trended down.



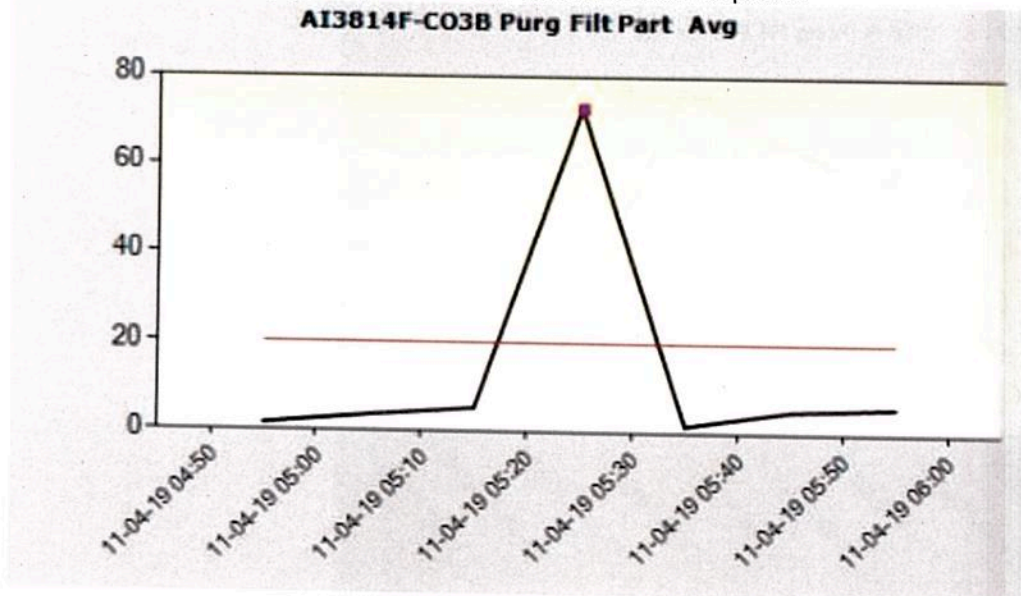


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

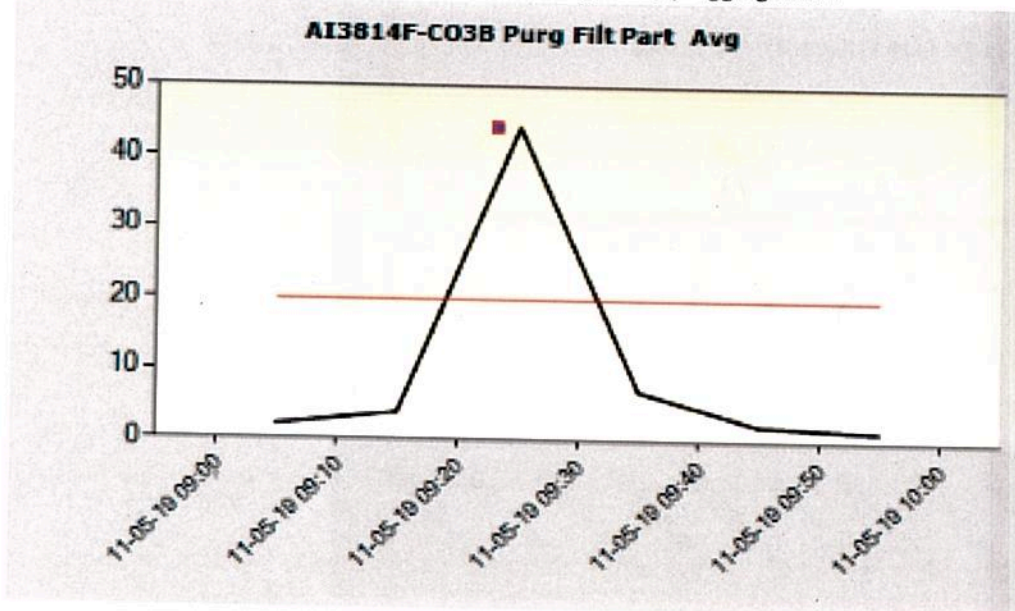
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3B Purge Filter, 11/4/2019, 5:25- 5:35; Pulled and cleaned probe.



CO-3B Purge Filter, 11/5/2019, 9:25 – 9:35; leaking filter; plugging filter.

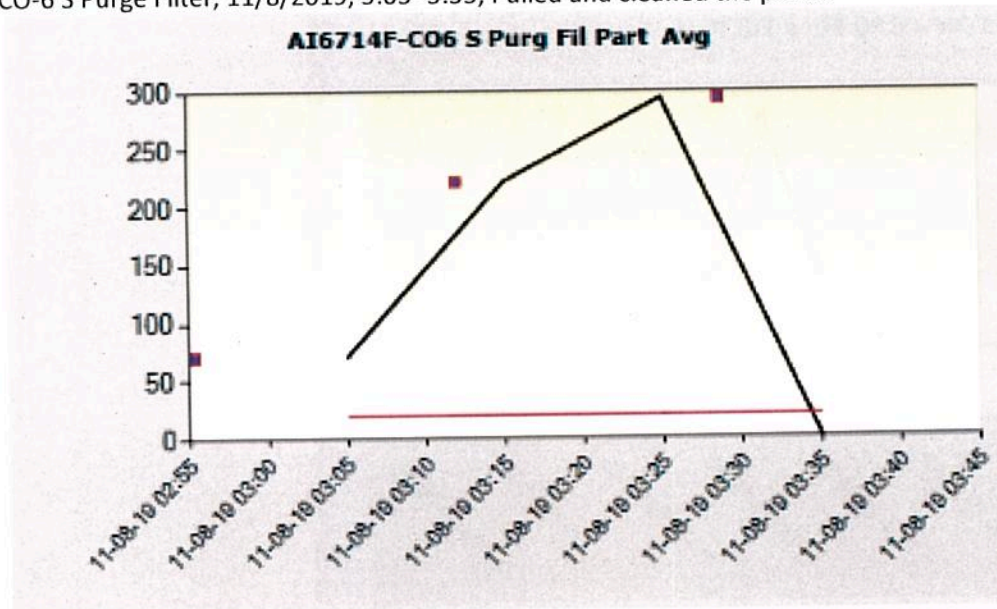


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

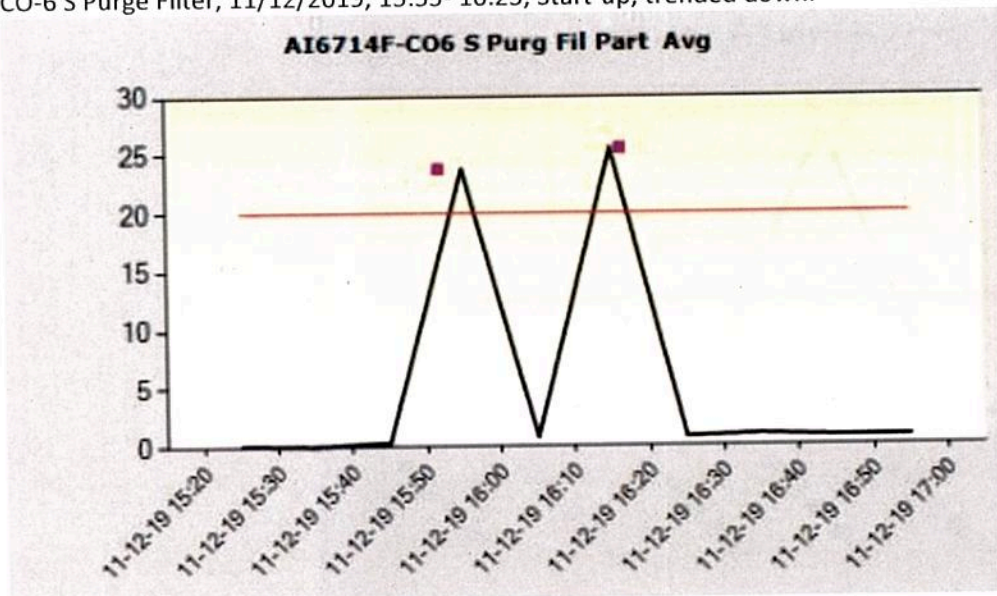
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-6 S Purge Filter, 11/8/2019, 3:05- 3:35; Pulled and cleaned the probe.



CO-6 S Purge Filter, 11/12/2019; 15:55- 16:25; Start-up; trended down.

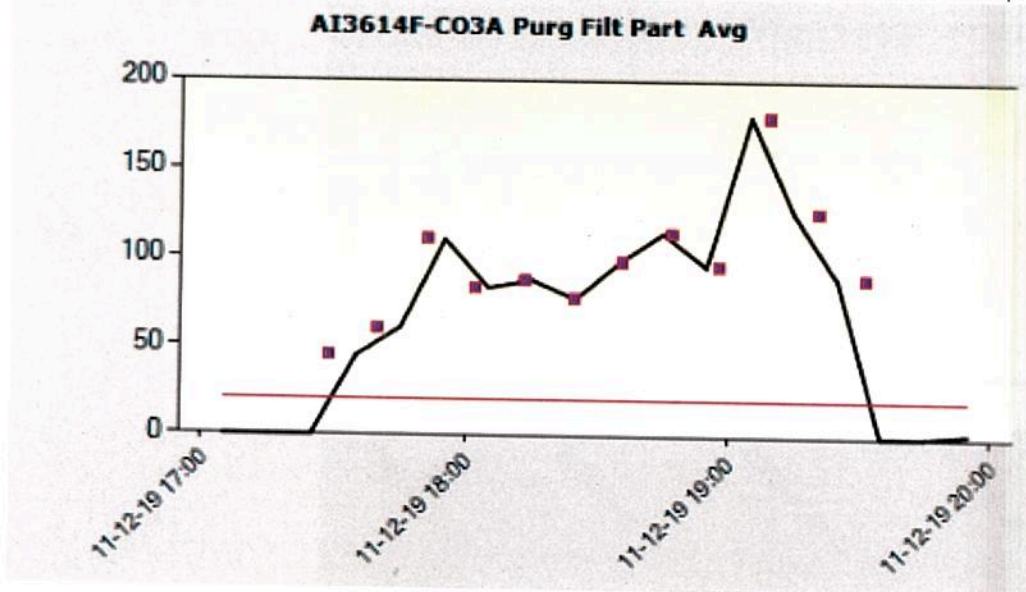


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

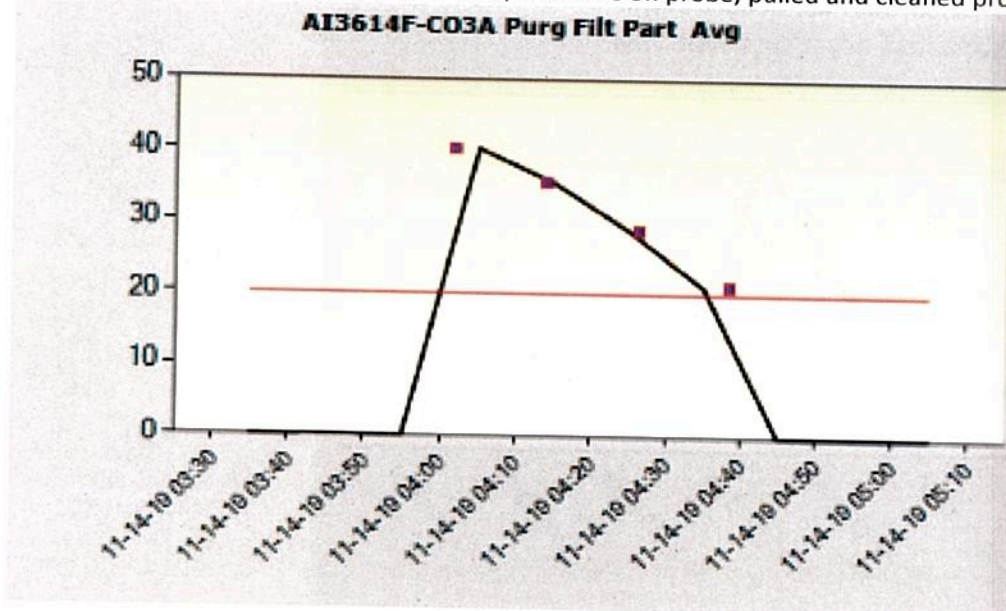
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A Purge Filter, 11/12/2019, 17:35- 19:35; Moisture on probe; pulled and cleaned probe.



CO-3A Purge Filter, 11/14/2019, 4:05- 4:45; Moisture on probe; pulled and cleaned probe.



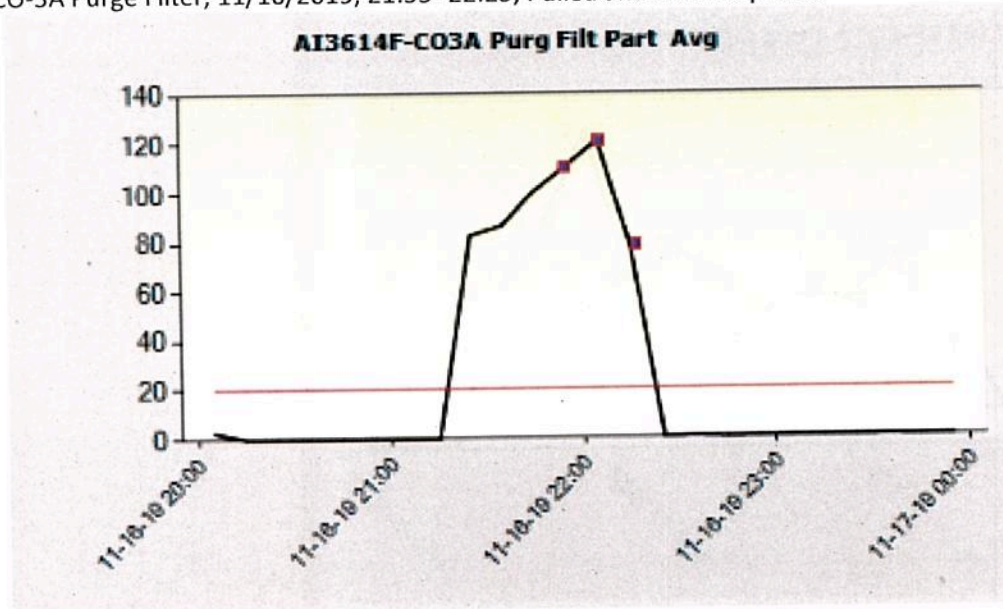


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

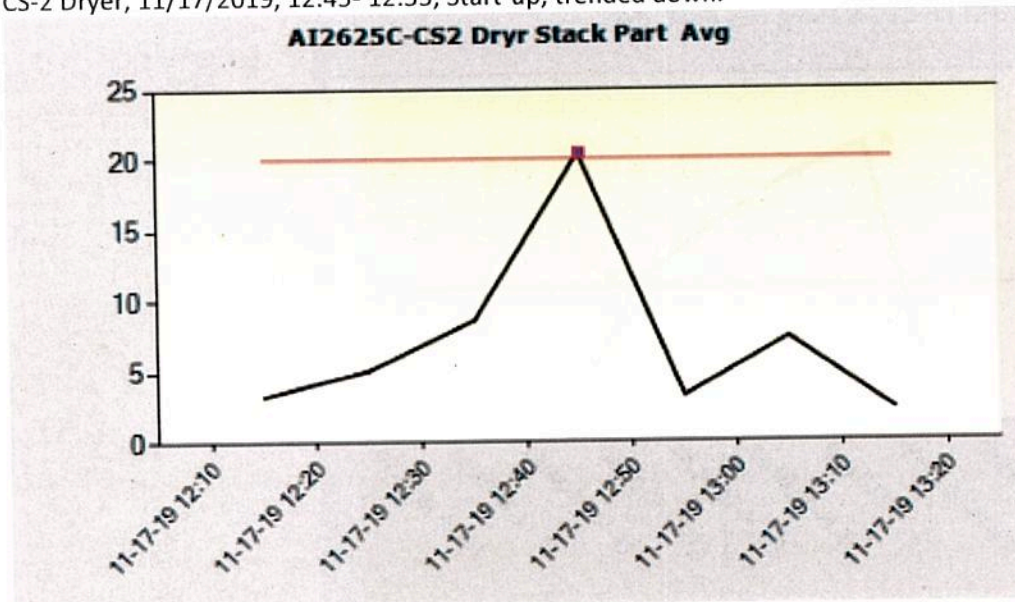
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A Purge Filter, 11/16/2019, 21:55- 22:25; Pulled and cleaned probe.



CS-2 Dryer, 11/17/2019, 12:45- 12:55; Start-up; trended down.

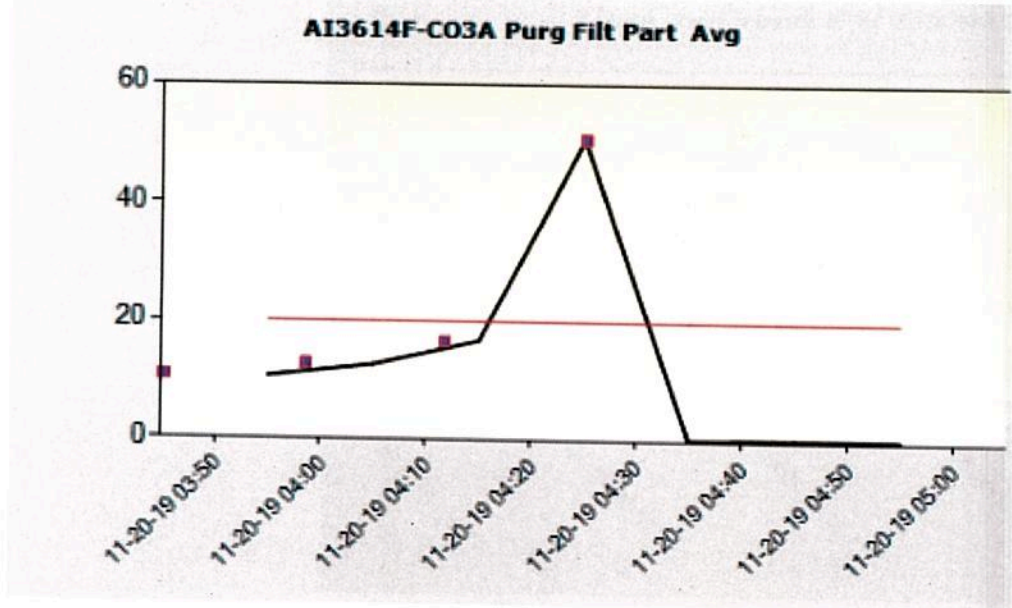


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

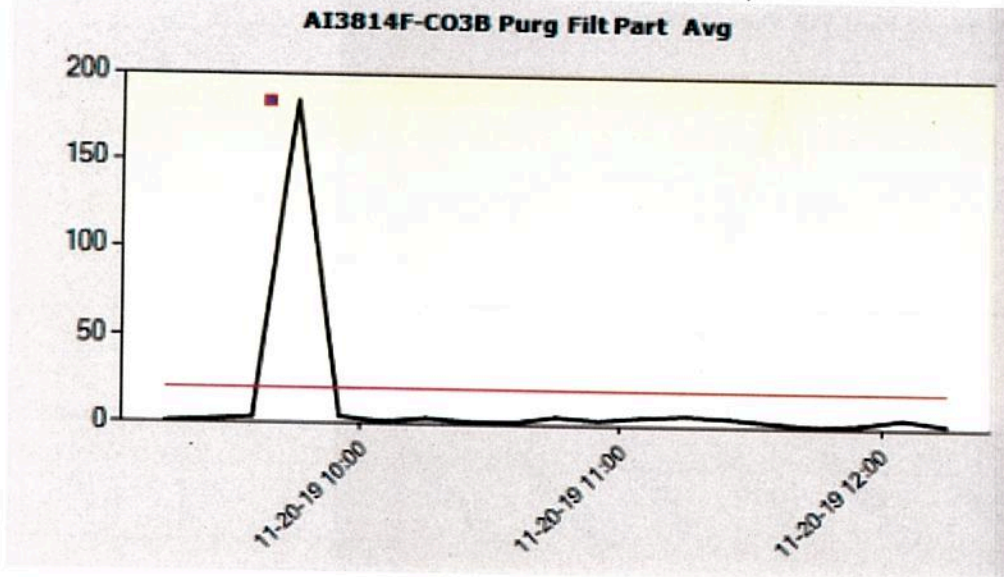
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A Purge Filter, 11/20/2019, 4:25- 4:35; Moisture on probe; pulled and cleaned probe.



CO-3B Purge Filter, 11/20/2019, 9:45- 9:55; Pulled and cleaned probe.

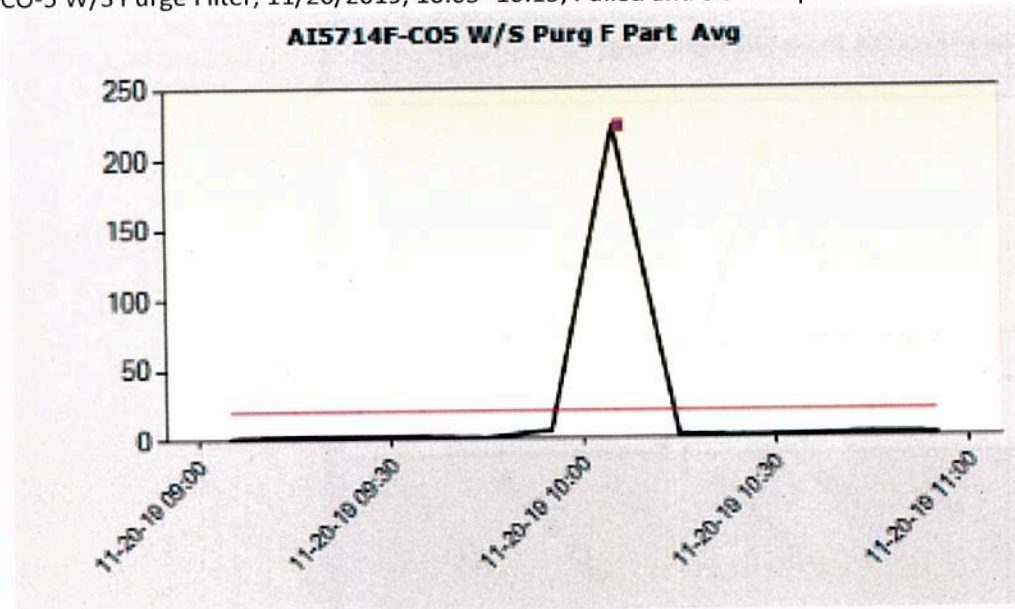


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

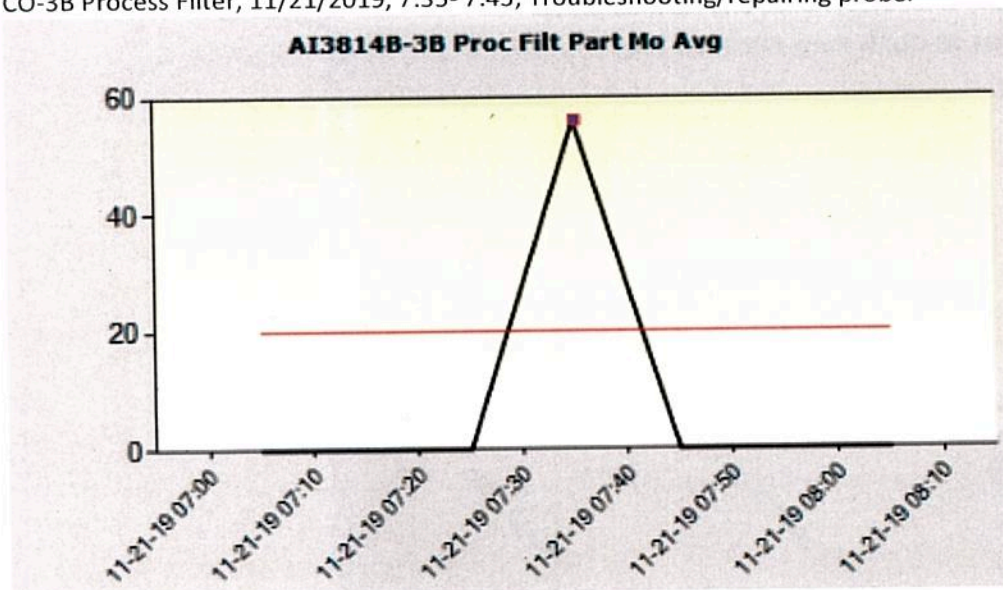
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-5 W/S Purge Filter, 11/20/2019, 10:05- 10:15; Pulled and cleaned probe.



CO-3B Process Filter, 11/21/2019, 7:35- 7:45; Troubleshooting/repairing probe.



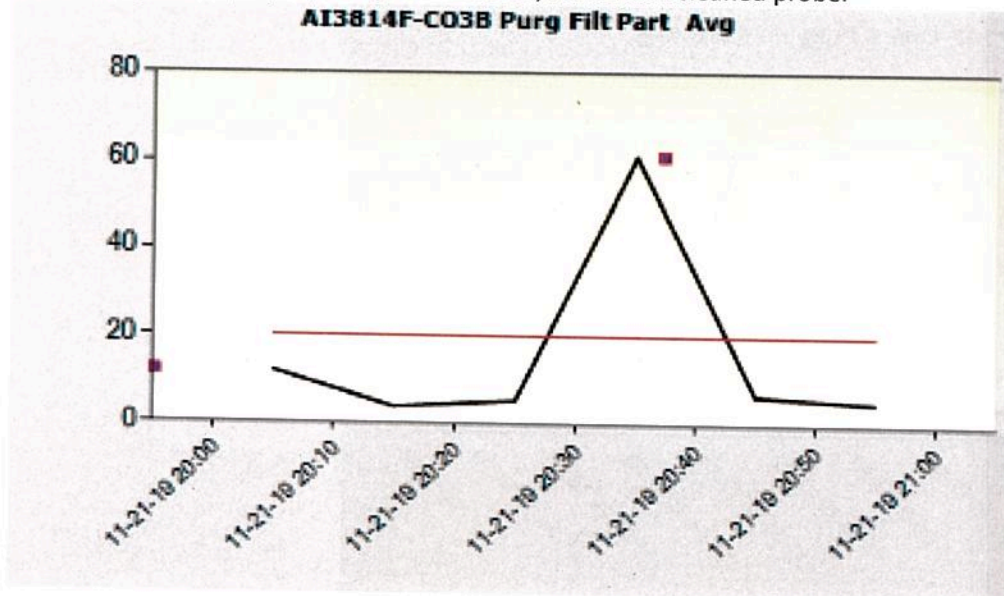


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

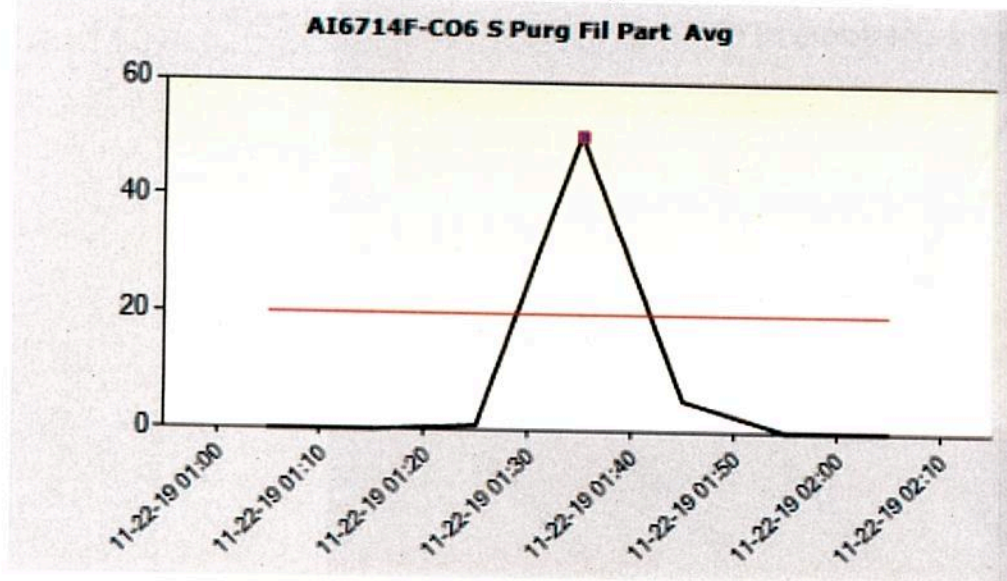
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3B Purge Filter, 11/21/2019, 20:35- 20:45; Pulled and cleaned probe.



CO-6 S Purge Filter, 11/22/2019, 1:35- 1:45; Start-up; trended down.

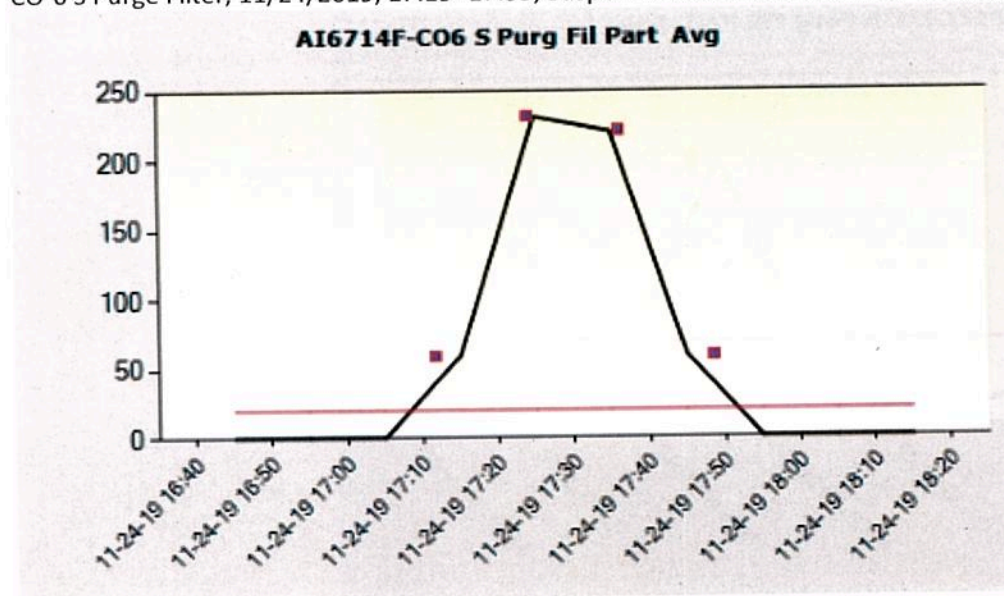


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

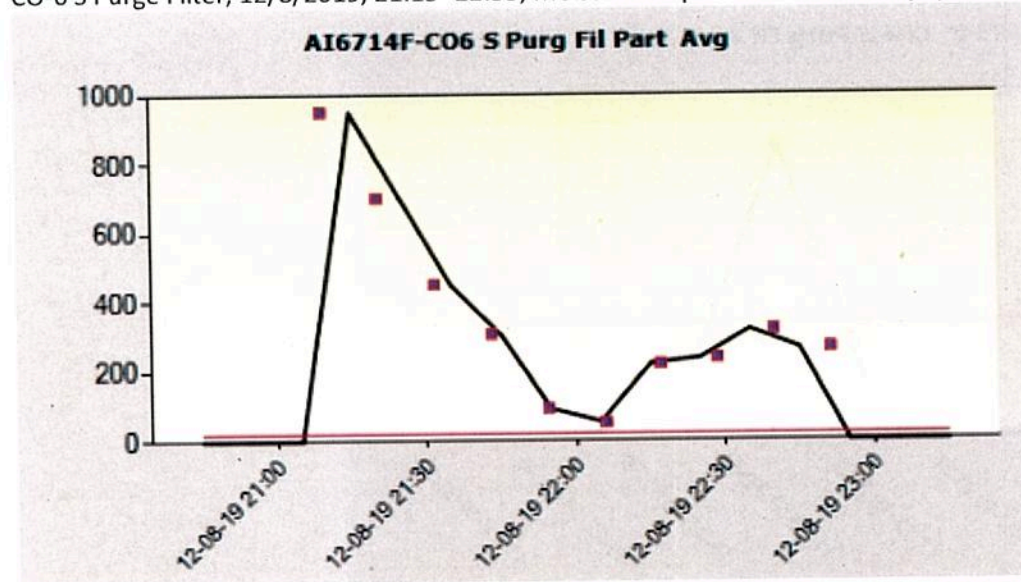
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-6 S Purge Filter, 11/24/2019, 17:15- 17:55; Suspected technical difficulties; trended down.



CO-6 S Purge Filter, 12/8/2019, 21:15- 22:55; Moisture on probe from warm-up; pulled and cleaned probe.

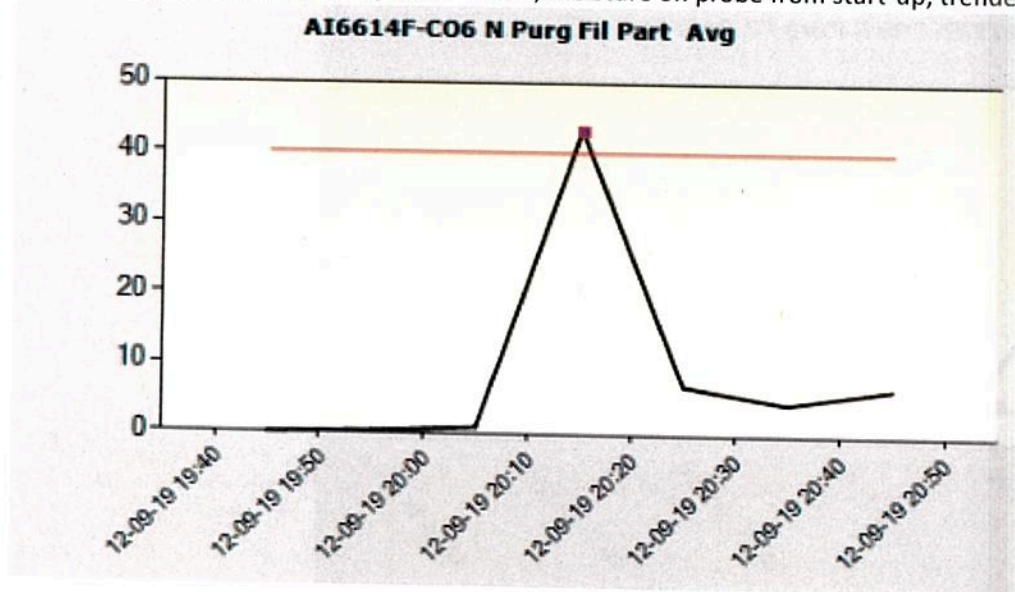


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

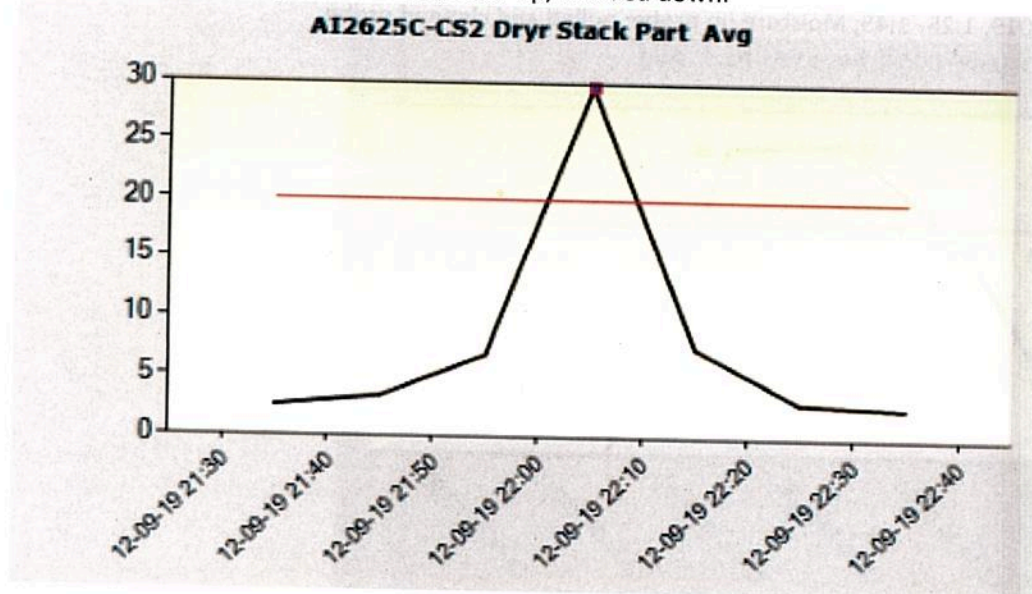
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-6 N Purge Filter, 12/9/2019, 20:15- 20:25; Moisture on probe from start-up; trended down.



CS-2 Dryer, 12/9/2019, 22:05- 22:15; Start-up; trended down.



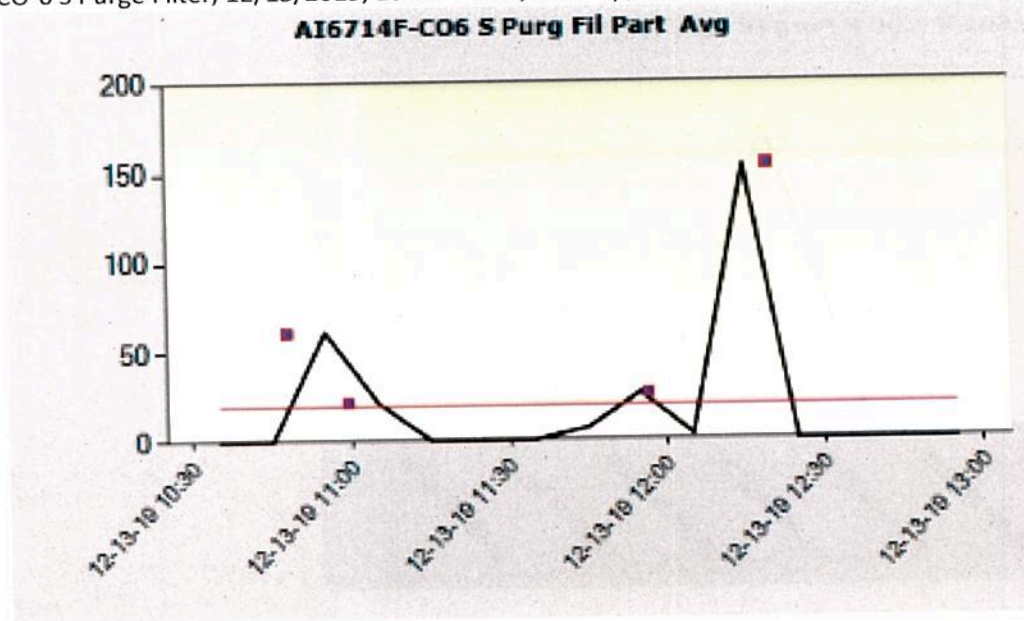


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

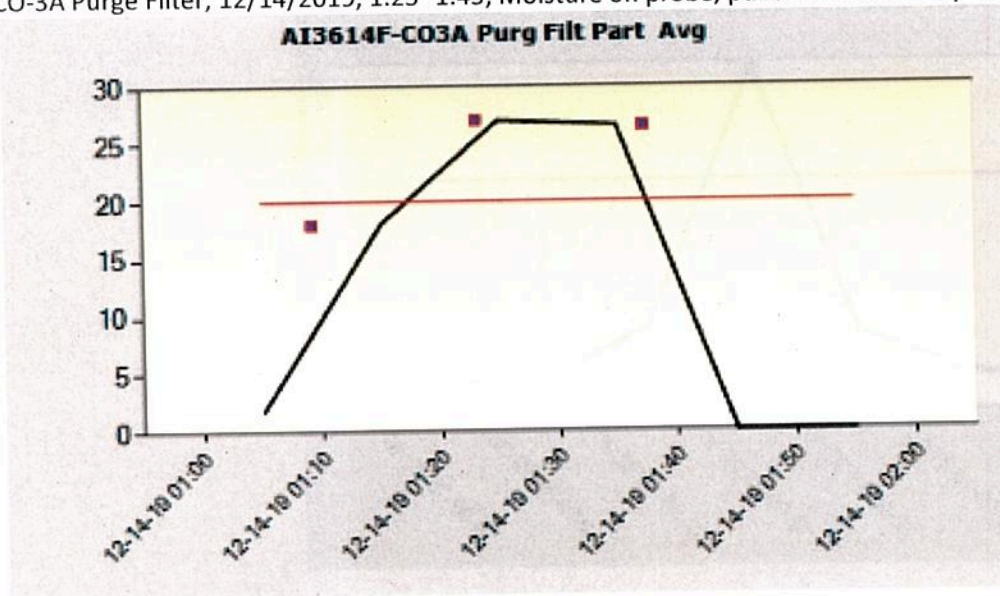
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-6 S Purge Filter, 12/13/2019, 10:55- 12:25; Start-up; moisture on probe; pulled and cleaned probe; trended down.



CO-3A Purge Filter, 12/14/2019, 1:25- 1:45; Moisture on probe; pulled and cleaned probe

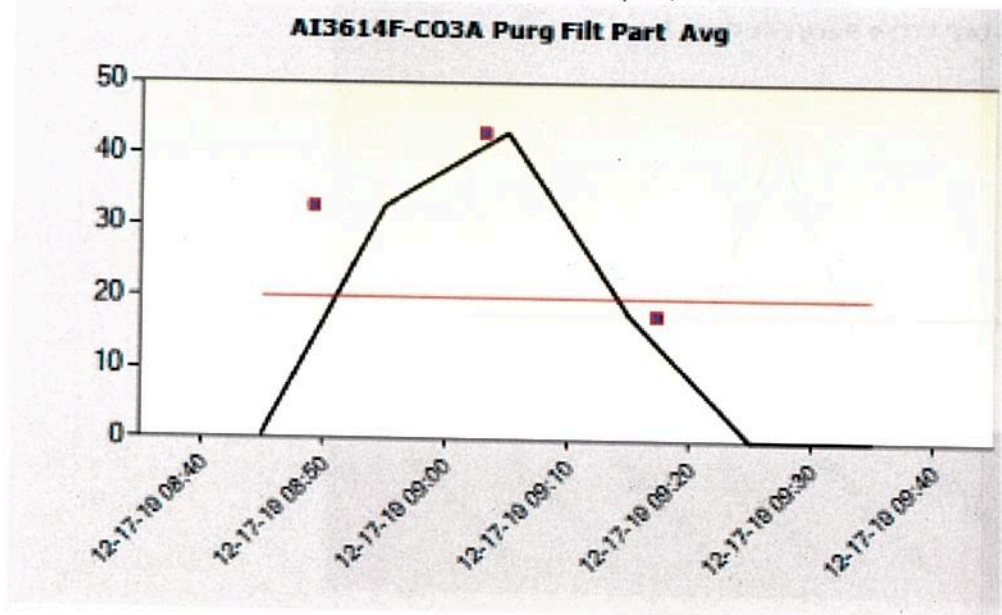


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

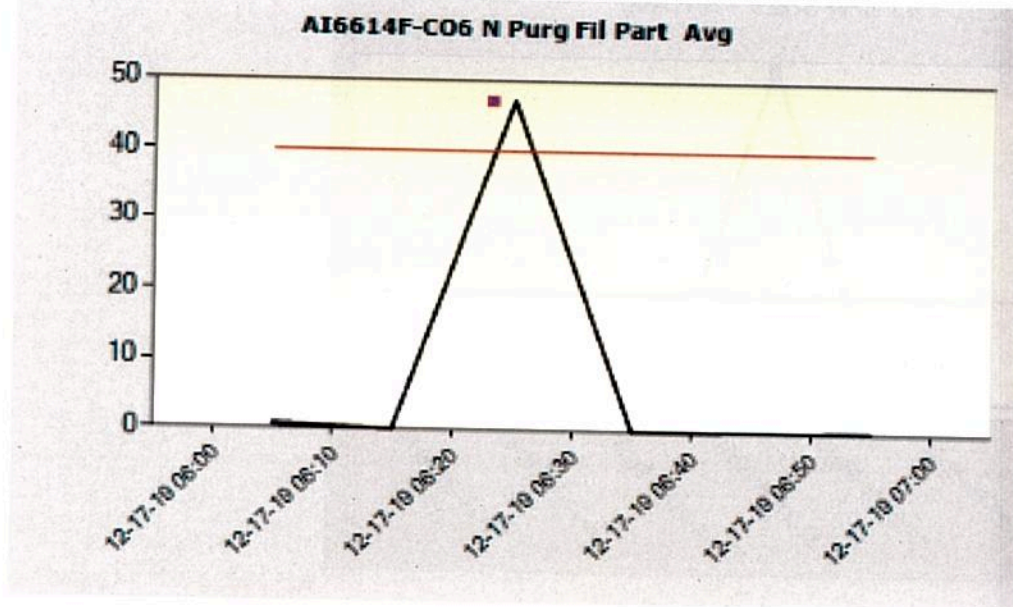
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A Purge Filter, 12/17/2019, 9:15- 9:25; Sudden spike; trended down.



CO-6 N Purge Filter, 12/17/2019, 6:25- 6:35; Sudden spike; trended down.

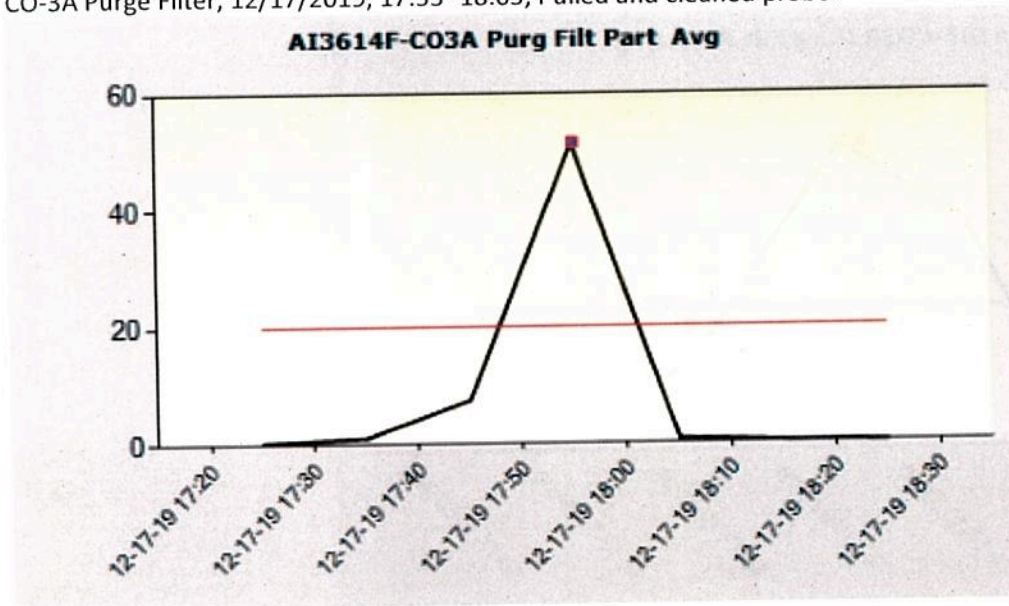


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

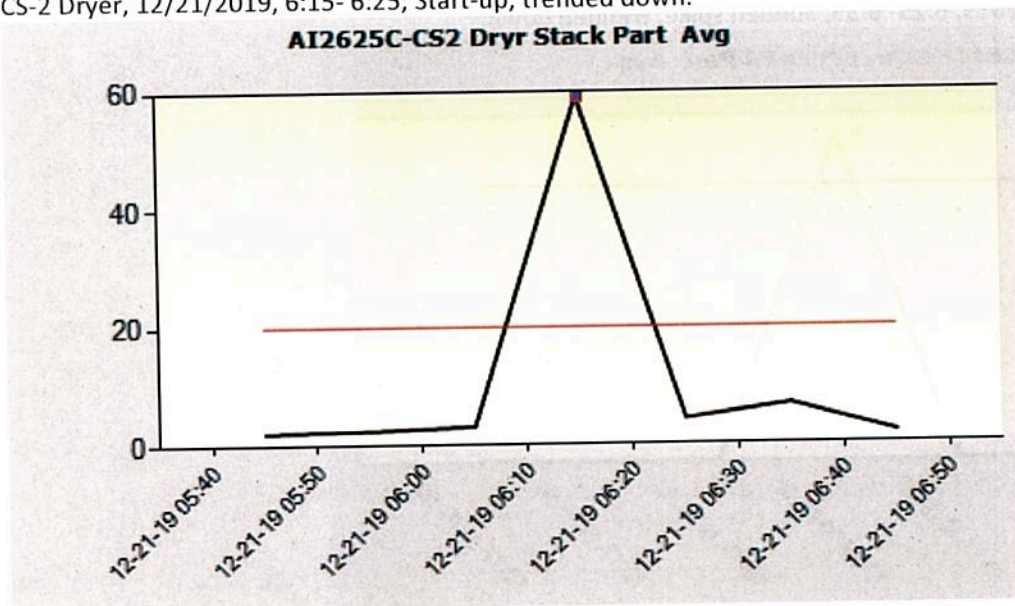
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A Purge Filter, 12/17/2019, 17:55- 18:05; Pulled and cleaned probe.



CS-2 Dryer, 12/21/2019, 6:15- 6:25; Start-up; trended down.



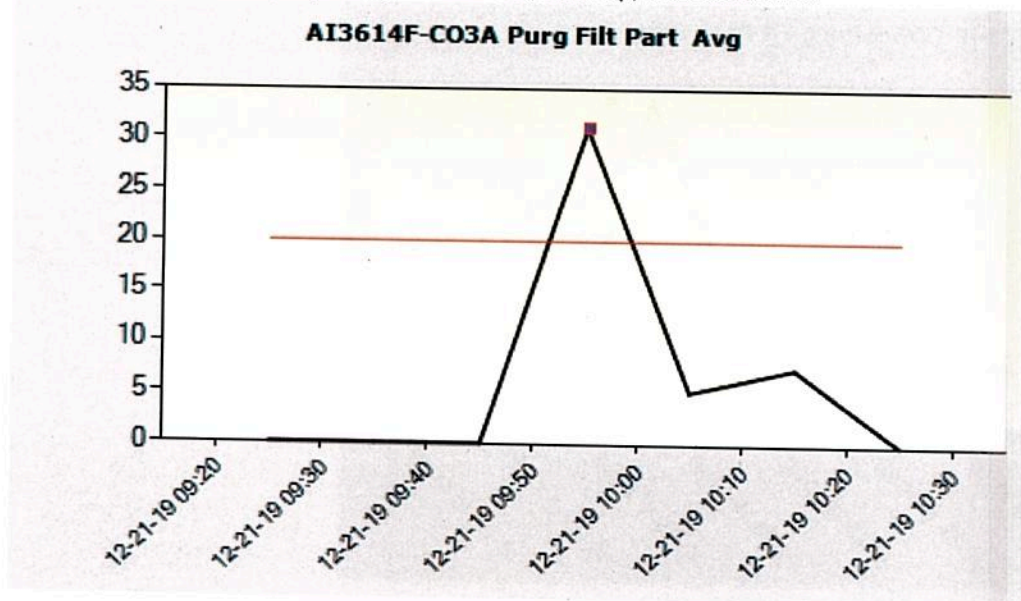


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

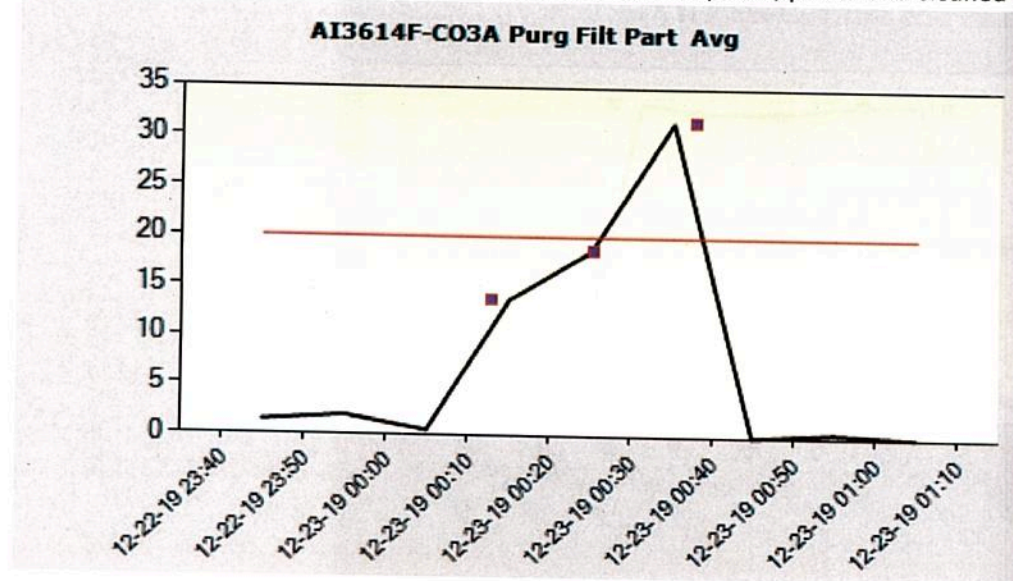
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-3A Purge Filter, 12/21/2019, 9:55- 10:05; Start-up; trended down.



CO-3A Purge Filter, 12/23/2019, 00:35- 00:45; Moisture on probe; pulled and cleaned probe.



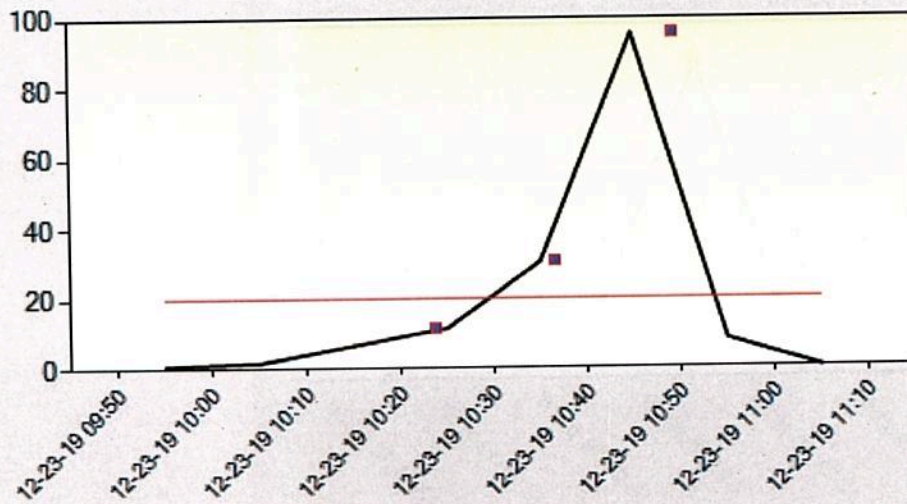
CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

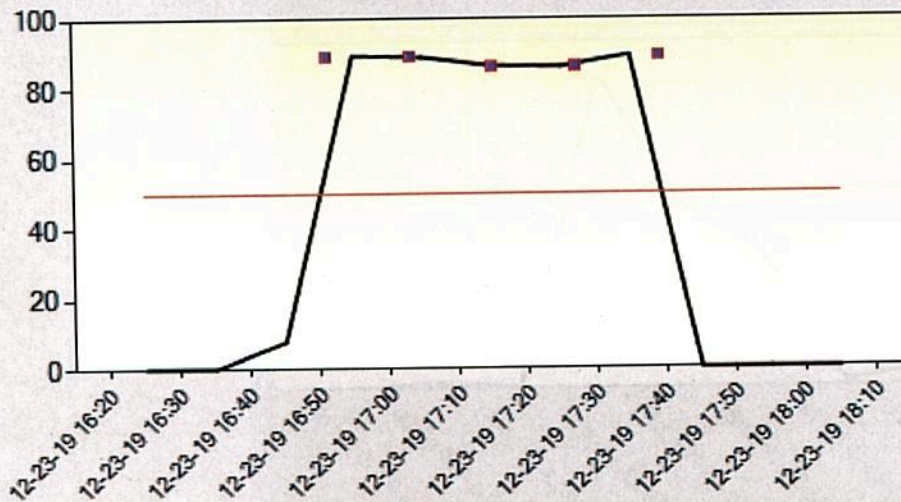
CO-6 S Purge Filter, 12/23/2019, 10:35- 10:55; Moisture on probe; pulled and cleaned probe.

AI6714F-CO6 S Purg Fil Part Avg



CO-5 MUF, 12/23/2019, 16:55- 17:45; Technical difficulties; troubleshooting/repairing probe.

KI5514D-CO5 MUF Particulat M Avg

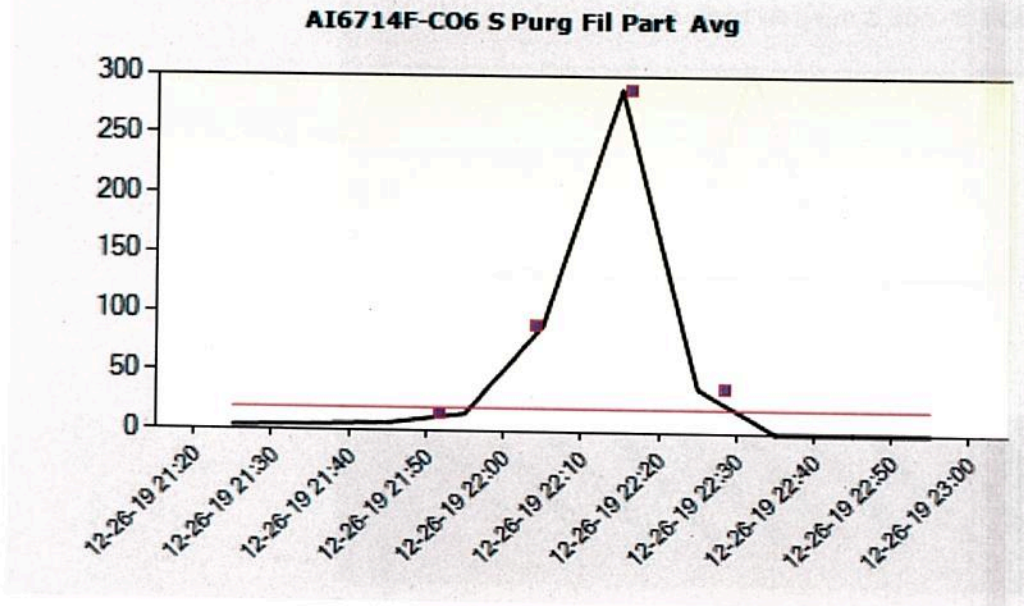


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

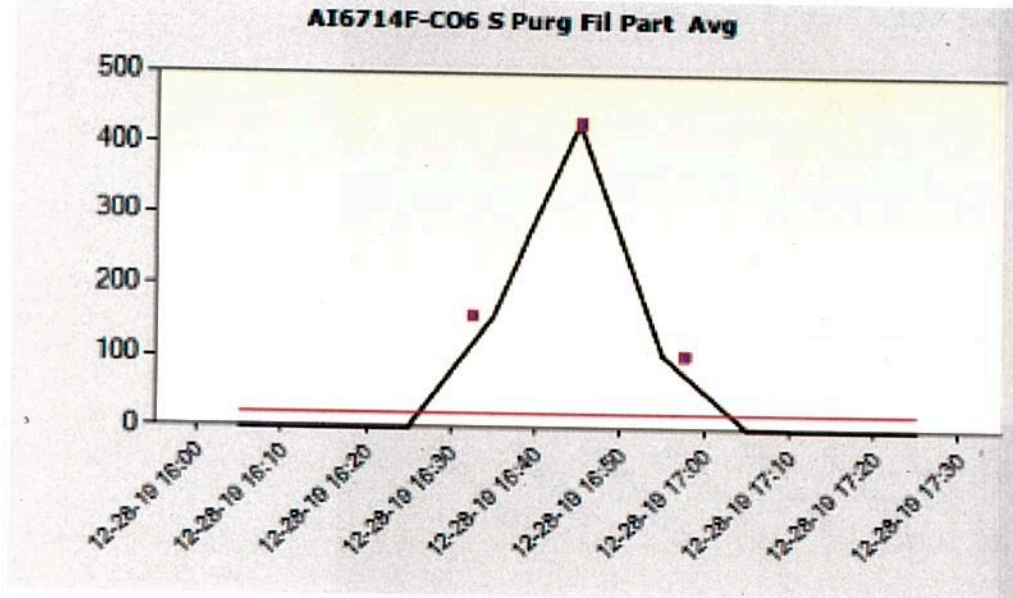
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-6 S Purge Filter, 12/26/2019, 22:05- 22:35; Moisture on probe; pulled and cleaned probe.



CO-6 S Purge Filter, 12/28/2019, 16:35-17:05; Start-up; trended down.



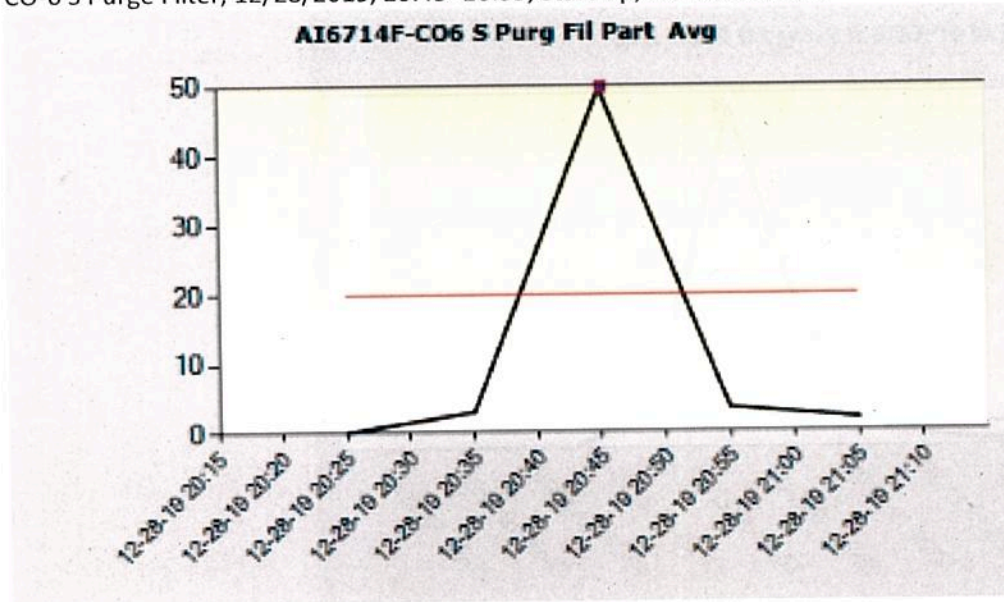


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

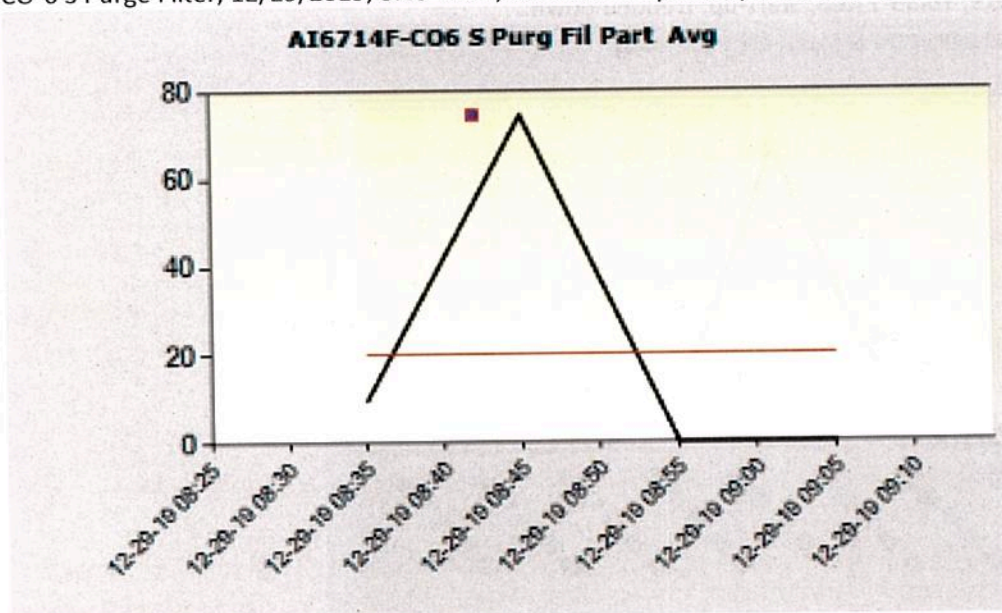
CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-6 S Purge Filter, 12/28/2019, 20:45- 20:55; Start-up; Trended down.



CO-6 S Purge Filter, 12/29/2019, 8:45- 8:55; Moisture on probe; pulled and cleaned probe.

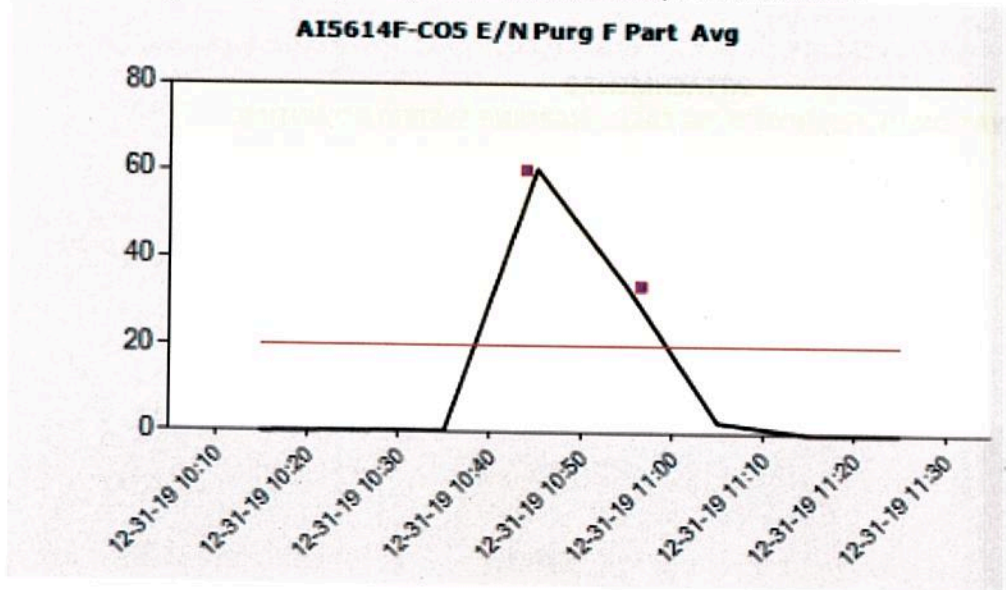


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

CO-5 E/N Purge Filter, 12/31/2019, 10:45- 11:05; Start-up; trended down.



**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**CANAL PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

**ATTACHMENT 2  
EXPLANATION OF PERIODS OF PM EARLY WARNING SYSTEM DOWNTIME**



**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**CANAL PLANT**

**REPORTING PERIOD:** July 1, 2019– December 31, 2019

**PMEWS Maintenance Events Detail: 01-Jul-2019 to  
31-Dec-2019**



Unit	Source	Start Time	End Time	Duration Hours	Alarm Type	Status Code	Status Description	Consent Decree
CO-3A	Dryer - South	18-Aug-2019 21:21	18-Aug-2019 21:27	0.10	General	16	No Response from Sensor	Y
CO-3A	Dryer - South	18-Aug-2019 21:28	18-Aug-2019 21:30	0.03	General	16	No Response from Sensor	Y
CO-3A	Dryer - South	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	Dryer - South	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	Dryer - South	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3A	Dryer - South	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	MUF	06-Aug-2019 21:56	06-Aug-2019 21:57	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3A	MUF	06-Aug-2019 22:09	06-Aug-2019 22:10	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	MUF	07-Aug-2019 00:14	07-Aug-2019 00:34	0.33	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	MUF	27-Sep-2019 10:52	27-Sep-2019 10:53	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3A	MUF	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	MUF	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	MUF	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3A	MUF	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	Process Filter	06-Aug-2019 21:56	06-Aug-2019 21:57	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3A	Process Filter	06-Aug-2019 22:08	06-Aug-2019 22:09	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3A	Process Filter	06-Aug-2019 22:09	06-Aug-2019 22:10	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	Process Filter	06-Aug-2019 22:56	06-Aug-2019 22:57	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3A	Process Filter	07-Aug-2019 00:13	07-Aug-2019 00:14	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y

**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**CANAL PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

CO-3A	Process Filter	07-Aug-2019 00:14	07-Aug-2019 00:34	0.33	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	Process Filter	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	Process Filter	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	Process Filter	29-Oct-2019 14:00	29-Oct-2019 14:01	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3A	Process Filter	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3A	Process Filter	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	Purge Filter	25-Aug-2019 21:42	25-Aug-2019 23:24	1.70	SelfTest	16384	Sensor in Maintenance Mode	Y
CO-3A	Purge Filter	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	Purge Filter	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3A	Purge Filter	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3A	Purge Filter	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Dryer - North	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Dryer - North	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Dryer - North	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3B	Dryer - North	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Dryer - South	06-Jul-2019 23:51	06-Jul-2019 23:52	0.02	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-3B	Dryer - South	06-Jul-2019 23:53	07-Jul-2019 00:00	0.12	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-3B	Dryer - South	07-Jul-2019 00:00	07-Jul-2019 01:26	1.43	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-3B	Dryer - South	07-Jul-2019 01:39	07-Jul-2019 02:40	1.02	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-3B	Dryer - South	07-Jul-2019 03:00	07-Jul-2019 05:36	2.60	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-3B	Dryer - South	07-Jul-2019 05:53	07-Jul-2019 13:27	7.57	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-3B	Dryer - South	06-Aug-2019 21:56	06-Aug-2019 21:57	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3B	Dryer - South	06-Aug-2019 22:08	06-Aug-2019 22:09	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y



**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**CANAL PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

CO-3B	Dryer - South	06-Aug-2019 22:09	06-Aug-2019 22:10	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Dryer - South	07-Aug-2019 00:13	07-Aug-2019 00:14	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3B	Dryer - South	07-Aug-2019 00:14	07-Aug-2019 00:34	0.33	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Dryer - South	18-Aug-2019 21:21	18-Aug-2019 21:27	0.10	General	16	No Response From Sensor	Y
CO-3B	Dryer - South	18-Aug-2019 21:28	18-Aug-2019 21:30	0.03	General	16	No Response From Sensor	Y
CO-3B	Dryer - South	02-Sep-2019 18:22	02-Sep-2019 18:28	0.10	General	16	No Response From Sensor	Y
CO-3B	Dryer - South	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Dryer - South	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Dryer - South	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3B	Dryer - South	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	MUF	06-Aug-2019 21:56	06-Aug-2019 21:57	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3B	MUF	06-Aug-2019 22:09	06-Aug-2019 22:10	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	MUF	07-Aug-2019 00:14	07-Aug-2019 00:34	0.33	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	MUF	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	MUF	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	MUF	31-Oct-2019 22:49	31-Oct-2019 22:50	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3B	MUF	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3B	MUF	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Process Filter	29-Jul-2019 05:35	29-Jul-2019 08:38	3.05	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-3B	Process Filter	06-Aug-2019 21:56	06-Aug-2019 21:57	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3B	Process Filter	06-Aug-2019 22:08	06-Aug-2019 22:09	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3B	Process Filter	06-Aug-2019 22:09	06-Aug-2019 22:10	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Process Filter	07-Aug-2019 00:13	07-Aug-2019 00:14	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y



**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**CANAL PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

CO-3B	Process Filter	07-Aug-2019 00:14	07-Aug-2019 00:34	0.33	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Process Filter	25-Aug-2019 03:22	25-Aug-2019 07:16	3.90	SelfTest	16384	Sensor in Maintenance Mode	Y
CO-3B	Process Filter	25-Aug-2019 07:39	25-Aug-2019 07:53	0.23	SelfTest	16512	Error Code->16512	Y
CO-3B	Process Filter	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Process Filter	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Process Filter	02-Nov-2019 00:21	02-Nov-2019 00:22	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3B	Process Filter	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3B	Process Filter	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Purge Filter	06-Aug-2019 21:56	06-Aug-2019 21:57	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3B	Purge Filter	06-Aug-2019 22:08	06-Aug-2019 22:09	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3B	Purge Filter	06-Aug-2019 22:09	06-Aug-2019 22:10	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Purge Filter	07-Aug-2019 00:13	07-Aug-2019 00:14	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3B	Purge Filter	07-Aug-2019 00:14	07-Aug-2019 00:34	0.33	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Purge Filter	09-Oct-2019 11:07	09-Oct-2019 11:08	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3B	Purge Filter	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Purge Filter	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Purge Filter	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-3B	Purge Filter	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-3B	Purge Filter	21-Nov-2019 08:38	21-Nov-2019 08:39	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-5	Dryer - North	18-Aug-2019 21:21	18-Aug-2019 21:27	0.10	General	16	No Response From Sensor	Y
CO-5	Dryer - North	18-Aug-2019 21:28	18-Aug-2019 21:30	0.03	General	16	No Response From Sensor	Y
CO-5	Dryer - North	02-Sep-2019 18:36	02-Sep-2019 18:57	0.35	General	16	No Response From Sensor	Y
CO-5	Dryer - North	02-Sep-2019 18:57	02-Sep-2019 18:58	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y

**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**CANAL PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

CO-5	Dryer - North	02-Sep-2019 18:58	02-Sep-2019 19:01	0.05	General	16	No Response From Sensor	Y
CO-5	Dryer - North	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	Dryer - North	29-Oct-2019 12:21	29-Oct-2019 13:59	1.63	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	Dryer - North	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-5	Dryer - North	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	Dryer - South	09-Aug-2019 06:36	09-Aug-2019 06:37	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-5	Dryer - South	18-Aug-2019 21:21	18-Aug-2019 21:27	0.10	General	16	No Response From Sensor	Y
CO-5	Dryer - South	18-Aug-2019 21:28	18-Aug-2019 21:30	0.03	General	16	No Response From Sensor	Y
CO-5	Dryer - South	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	Dryer - South	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	Dryer - South	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-5	Dryer - South	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	MUF	06-Aug-2019 21:56	06-Aug-2019 21:57	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-5	MUF	06-Aug-2019 22:09	06-Aug-2019 22:10	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	MUF	07-Aug-2019 00:14	07-Aug-2019 00:34	0.33	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	MUF	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	MUF	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	MUF	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-5	MUF	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	MUF	23-Dec-2019 18:08	23-Dec-2019 18:09	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-5	Process Filter	06-Aug-2019 21:56	06-Aug-2019 21:57	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-5	Process Filter	06-Aug-2019 22:08	06-Aug-2019 22:09	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-5	Process Filter	06-Aug-2019 22:09	06-Aug-2019 22:10	0.02	Aspen	2	Comm Error - No Data in 15 min	Y



**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**CANAL PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

CO-5	Process Filter	07-Aug-2019 00:13	07-Aug-2019 00:14	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-5	Process Filter	07-Aug-2019 00:14	07-Aug-2019 00:34	0.33	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	Process Filter	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	Process Filter	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	Process Filter	29-Oct-2019 14:00	29-Oct-2019 14:01	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-5	Process Filter	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-5	Process Filter	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	Purge Filter - North	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	Purge Filter - North	29-Oct-2019 12:21	29-Oct-2019 13:59	1.63	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	Purge Filter - North	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-5	Purge Filter - North	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	Purge Filter - South	09-Aug-2019 05:49	09-Aug-2019 05:50	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-5	Purge Filter - South	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	Purge Filter - South	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CO-5	Purge Filter - South	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-5	Purge Filter - South	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Dryer - North	06-Aug-2019 05:35	06-Aug-2019 07:08	1.55	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-6	Dryer - North	07-Aug-2019 03:07	07-Aug-2019 04:41	1.57	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-6	Dryer - North	15-Aug-2019 11:20	15-Aug-2019 12:53	1.55	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-6	Dryer - North	16-Aug-2019 05:50	16-Aug-2019 10:21	4.52	SelfTest	16384	Sensor in Maintenance Mode	Y



**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**CANAL PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

CO-6	Dryer - North	17-Aug-2019 03:07	17-Aug-2019 03:14	0.12	SelfTest	16384	Sensor in Maintenance Mode	Y
CO-6	Dryer - North	17-Aug-2019 04:03	17-Aug-2019 04:04	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-6	Dryer - North	18-Aug-2019 19:46	18-Aug-2019 21:19	1.55	SelfTest	16384	Sensor in Maintenance Mode	Y
CO-6	Dryer - North	18-Aug-2019 21:29	18-Aug-2019 21:30	0.02	General	16	No Response From Sensor	Y
CO-6	Dryer - North	18-Aug-2019 21:43	18-Aug-2019 22:35	0.87	SelfTest	16384	Sensor in Maintenance Mode	Y
CO-6	Dryer - North	18-Aug-2019 22:36	18-Aug-2019 22:37	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-6	Dryer - North	19-Aug-2019 20:12	20-Aug-2019 00:00	3.80	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-6	Dryer - North	20-Aug-2019 00:00	20-Aug-2019 05:55	5.92	SelfTest	16384	Sensor in Maintenance Mode	Y
CO-6	Dryer - North	20-Aug-2019 05:58	20-Aug-2019 06:07	0.15	SelfTest	16384	Sensor in Maintenance Mode	Y
CO-6	Dryer - North	20-Aug-2019 08:01	20-Aug-2019 08:06	0.08	SelfTest	16384	Sensor in Maintenance Mode	Y
CO-6	Dryer - North	20-Aug-2019 08:08	20-Aug-2019 08:09	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-6	Dryer - North	25-Aug-2019 14:13	25-Aug-2019 18:47	4.57	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-6	Dryer - North	27-Aug-2019 10:20	27-Aug-2019 20:24	10.07	SelfTest	16384	Sensor in Maintenance Mode	Y
CO-6	Dryer - North	27-Aug-2019 20:39	27-Aug-2019 20:40	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-6	Dryer - North	28-Aug-2019 16:45	28-Aug-2019 18:17	1.53	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-6	Dryer - North	29-Aug-2019 12:54	29-Aug-2019 17:35	4.68	SelfTest	16512	Error Code->16512	Y
CO-6	Dryer - North	29-Aug-2019 17:48	29-Aug-2019 20:15	2.45	SelfTest	16384	Sensor in Maintenance Mode	Y
CO-6	Dryer - North	30-Aug-2019 14:49	30-Aug-2019 16:39	1.83	SelfTest	16384	Sensor in Maintenance Mode	Y
CO-6	Dryer - North	04-Sep-2019 00:46	04-Sep-2019 00:57	0.18	General	16	No Response From Sensor	Y
CO-6	Dryer - North	13-Sep-2019 10:14	13-Sep-2019 10:28	0.23	General	16	No Response From Sensor	Y
CO-6	Dryer - North	18-Sep-2019 16:52	18-Sep-2019 17:41	0.82	General	16	No Response From Sensor	Y
CO-6	Dryer - North	19-Sep-2019 13:31	19-Sep-2019 13:40	0.15	General	16	No Response From Sensor	Y
CO-6	Dryer - North	19-Sep-2019 13:41	19-Sep-2019 13:45	0.07	General	16	No Response From Sensor	Y

**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**CANAL PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

CO-6	Dryer - North	24-Sep-2019 15:43	24-Sep-2019 16:27	0.73	SelfTest	16384	Sensor in Maintenance Mode	Y
CO-6	Dryer - North	25-Sep-2019 14:53	25-Sep-2019 18:00	3.13	SelfTest	16384	Sensor in Maintenance Mode	Y
CO-6	Dryer - North	01-Oct-2019 14:16	01-Oct-2019 17:15	2.98	SelfTest	16384	Sensor in Maintenance Mode	Y
CO-6	Dryer - North	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Dryer - North	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-6	Dryer - North	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Dryer - South	18-Aug-2019 21:21	18-Aug-2019 21:27	0.10	General	16	No Response From Sensor	Y
CO-6	Dryer - South	18-Aug-2019 21:29	18-Aug-2019 21:30	0.02	General	16	No Response From Sensor	Y
CO-6	Dryer - South	02-Sep-2019 19:22	02-Sep-2019 19:24	0.03	General	16	No Response From Sensor	Y
CO-6	Dryer - South	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Dryer - South	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-6	Dryer - South	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	MUF	06-Aug-2019 21:56	06-Aug-2019 21:57	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-6	MUF	06-Aug-2019 22:09	06-Aug-2019 22:10	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	MUF	07-Aug-2019 00:14	07-Aug-2019 00:34	0.33	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	MUF	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	MUF	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	MUF	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-6	MUF	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Process Filter	06-Aug-2019 21:56	06-Aug-2019 21:57	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y

**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**CANAL PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

CO-6	Process Filter	06-Aug-2019 22:08	06-Aug-2019 22:09	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-6	Process Filter	06-Aug-2019 22:09	06-Aug-2019 22:10	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Process Filter	07-Aug-2019 00:13	07-Aug-2019 00:14	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-6	Process Filter	07-Aug-2019 00:14	07-Aug-2019 00:34	0.33	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Process Filter	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Process Filter	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Process Filter	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-6	Process Filter	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Purge Filter - North	06-Aug-2019 11:50	06-Aug-2019 19:07	7.28	SelfTest	16384	Sensor in Maintenance Mode	Y
CO-6	Purge Filter - North	06-Aug-2019 19:39	06-Aug-2019 20:37	0.97	SelfTest	16512	Error Code->16512	Y
CO-6	Purge Filter - North	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Purge Filter - North	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-6	Purge Filter - North	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Purge Filter - North	17-Dec-2019 11:51	17-Dec-2019 14:56	3.08	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CO-6	Purge Filter - South	09-Oct-2019 12:58	09-Oct-2019 12:59	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CO-6	Purge Filter - South	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CO-6	Purge Filter -	16-Nov-2019 20:11	16-Nov-2019 20:12	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y



**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**CANAL PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

South

CO-6	Purge Filter - South	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CS-1	MUF	06-Aug-2019 21:56	06-Aug-2019 21:57	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CS-1	MUF	06-Aug-2019 22:09	06-Aug-2019 22:10	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CS-1	MUF	07-Aug-2019 00:14	07-Aug-2019 00:34	0.33	Aspen	2	Comm Error - No Data in 15 min	Y
CS-1	Process Filter	27-Jul-2019 08:49	27-Jul-2019 14:18	5.48	Aspen	1	Flat Line-No New Data in 15 min	Y
CS-1	Process Filter	06-Aug-2019 21:56	06-Aug-2019 21:57	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CS-1	Process Filter	06-Aug-2019 22:09	06-Aug-2019 22:10	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CS-1	Process Filter	07-Aug-2019 00:14	07-Aug-2019 00:34	0.33	Aspen	2	Comm Error - No Data in 15 min	Y
CS-2	Dryer	09-Aug-2019 08:33	09-Aug-2019 08:34	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CS-2	Dryer	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CS-2	MUF	06-Aug-2019 21:56	06-Aug-2019 21:57	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CS-2	MUF	06-Aug-2019 22:09	06-Aug-2019 22:10	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CS-2	MUF	07-Aug-2019 00:14	07-Aug-2019 00:34	0.33	Aspen	2	Comm Error - No Data in 15 min	Y
CS-2	MUF	31-Aug-2019 20:37	31-Aug-2019 23:37	3.00	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CS-2	MUF	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
CS-2	MUF	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CS-2	MUF	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CS-2	Process Filter	06-Aug-2019 21:56	06-Aug-2019 21:57	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CS-2	Process Filter	06-Aug-2019 22:09	06-Aug-2019 22:10	0.02	Aspen	2	Comm Error - No Data in 15 min	Y
CS-2	Process Filter	07-Aug-2019 00:14	07-Aug-2019 00:34	0.33	Aspen	2	Comm Error - No Data in 15 min	Y
CS-2	Process Filter	09-Aug-2019 08:31	09-Aug-2019 08:32	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CS-2	Process Filter	16-Oct-2019 08:22	16-Oct-2019 08:23	0.01	Aspen	2	Comm Error - No Data in 15 min	Y

**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**CANAL PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

CS-2	Process Filter	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y
CS-2	Process Filter	16-Nov-2019 20:12	16-Nov-2019 21:19	1.12	Aspen	2	Comm Error - No Data in 15 min	Y
CS-2	Purge Filter	08-Oct-2019 05:28	08-Oct-2019 08:00	2.53	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CS-2	Purge Filter	08-Oct-2019 10:46	08-Oct-2019 10:47	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CS-2	Purge Filter	22-Oct-2019 20:41	22-Oct-2019 22:09	1.47	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CS-2	Purge Filter	22-Oct-2019 23:43	22-Oct-2019 23:44	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CS-2	Purge Filter	25-Oct-2019 21:04	25-Oct-2019 23:01	1.95	SelfTest	16384	Sensor in Maintenance Mode	Y
CS-2	Purge Filter	25-Oct-2019 23:03	25-Oct-2019 23:04	0.02	Aspen	1	Flat Line-No New Data in 15 min	Y
CS-2	Purge Filter	26-Oct-2019 01:35	26-Oct-2019 04:54	3.32	SelfTest	128	Clean Probe (Short CircuitFault)	Y
CS-2	Purge Filter	29-Oct-2019 12:21	29-Oct-2019 14:00	1.65	Aspen	2	Comm Error - No Data in 15 min	Y

CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

CANAL PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

THIS PAGE LEFT INTENTIONALLY BLANK



CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**VILLE PLATTE PLANT**

REPORTING PERIOD: **JULY 1, 2019 – DECEMBER 31, 2019**

**a. A description of the construction of the Control Technologies, CEMS, and PM Early Warning Systems required by this Consent Decree, including:**

- i. *If construction is not underway, any available information concerning the construction schedule and the execution of major contracts.*

Consistent with the provisions of the Second Amendment of the Consent Decree, physical, on-site construction of Control Technologies and CEMS did not commence at the Ville Platte facility during the relevant reporting period.

- o Anticipated construction schedule:

- Front End Engineering & Design – 6/2020 through 3/2021
- Equipment fabrication – 6/2020 through 10/2021
- Detailed Engineering – 5/2021 through 1/2022
- Construction – 12/2020 through 7/2022
- Start - up / Commissioning – 8/2022 thru 12/2022
- Compliance – 12/31/2022

- ii. *If construction is underway, the estimated percent of installation as of the end of the reporting period, the current estimated construction completion date, and a brief description of completion of significant milestones during the reporting period.*

Consistent with the provisions of the Second Amendment of the Consent Decree, physical, on-site construction activity did not commence during the relevant reporting period.

- iii. *Any information indicating that installation and commencement of operation may be delayed, including the nature and cause of the delay.*

Based upon the best information currently available, Cabot has not identified any basis to anticipate any delay in satisfying the installation and construction schedules established under the Consent Decree.

- iv. *Once construction is complete, provide the dates the equipment was placed in service and/or commenced Continuous Operation and the dates of any testing that was performed during the period.*

Consistent with the provisions of the Second Amendment of the Consent Decree, construction activity for the control equipment was not completed during the relevant reporting period.

In satisfaction of the relevant terms of the Consent Decree, Cabot installed the equipment associated with the PM Early Warning Systems (PMEWS), established the alarm set-points, and commenced continuous operation of the system as of the Effective Date of the Consent Decree.

- b. All information necessary to demonstrate compliance with all applicable Emissions Limits, 30-day Rolling Average Sulfur Content Weight Percent, 365-day Rolling Average Sulfur Content Weight Percent, and other provisions in Sections VI (SO<sub>2</sub> Control Technology, Emissions Limits, and Monitoring Requirements), VII (NO<sub>x</sub> Control Technology, Emissions Limits, and Monitoring Requirements) and VIII (PM Control Technology, Emissions Limits, Best Management Practices, and Early Warning System Requirements)**

**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**VILLE PLATTE PLANT**

**REPORTING PERIOD: JULY 1, 2019 – DECEMBER 31, 2019**

- *Paragraph 17 - SO<sub>2</sub> Process System Operation, Emissions Limits and Control Technology*

Pursuant to the terms of the Second Amendment of the Consent Decree, Cabot was not required during the relevant reporting period to demonstrate compliance with any applicable emissions limit, or other provision in Sections VI (SO<sub>2</sub> Control Technology, Emissions Limits, and Monitoring Requirements), VII (NO<sub>x</sub> Control Technology, Emissions Limits, and Monitoring Requirements) and VIII (PM Control Technology, Emissions Limits, Best Management Practices, and Early Warning System Requirements) under the Consent Decree, except as specifically addressed herein.

- *Paragraph 18 - WGS Design Specifications*

Pursuant to the terms of the Second Amendment of the Consent Decree, submittal of design specifications for the WGS is not required until 30 months prior to installation, specifically no later than June 30, 2020.

- *Paragraph 19 - SO<sub>2</sub> Alternative Equivalent Pollution Control Technology*

Pursuant to the terms of the Second Amendment of the Consent Decree, if a SO<sub>2</sub> Alternative Equivalent Pollution Control Technology is elected, compliance with these requirements is not required until December 31, 2022, provided that a written request has been made by June 30, 2020, and written approval has been obtained from EPA.

- *Paragraph 20 - SO<sub>2</sub> Monitoring Requirements*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until December 31, 2022.

- *Paragraph 23 - NO<sub>x</sub> Emissions Limits Applicable to Heat Load Operation, Startup, and Shutdown*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until December 31, 2022.

- *Paragraph 24 - Heat Load Operation, Startup, and Shutdown Compliance Calculation*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until December 31, 2022.

- *Paragraph 25 - Alternative Heat Load Operation, Startup, and Compliance Calculation*

Pursuant to the terms of the Consent Decree, Cabot has not requested an Alternative Heat Load Operation, Startup, and Compliance Calculation for NO<sub>x</sub>.

- *Paragraph 26 - NO<sub>x</sub> Process System Operation Emissions Limits and Control Technology*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until December 31, 2022.

- *Paragraph 27 - SCR Design Specifications*



**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**VILLE PLATTE PLANT**

**REPORTING PERIOD: JULY 1, 2019 – DECEMBER 31, 2019**

Pursuant to the terms of the Second Amendment of the Consent Decree, submittal of design specifications for the SCR is not required until 30 months prior to installation, specifically no later than June 30, 2020.

- *Paragraph 28 - NO<sub>x</sub> Alternative Equivalent Pollution Control Technology*

Pursuant to the terms of the Second Amendment of the Consent Decree, if the NO<sub>x</sub> Alternative Equivalent Pollution Control Technology is elected, compliance with these requirements is not required until December 31, 2022. In addition, a request for approval must be submitted by June 30, 2020, and written approval must be granted by EPA.

- *Paragraph 29 - NO<sub>x</sub> Monitoring Requirements*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until December 31, 2022.

- *Paragraph 30 - PM Control Technology and Emissions Limits*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until 180 days after December 31, 2022, or June 29, 2023.

- *Paragraph 31 - PM Stack Testing*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until 180 days after December 31, 2022, or June 29, 2023.

- *Paragraph 32 and Appendix B - Other PM Control Requirements*

During the reporting period, Cabot achieved and maintained compliance with the requirements of Paragraph 32 and Appendix B of the Consent Decree relative to particulate matter ("PM") control requirements. More specifically, for each PM emissions equipment unit:

- Cabot employed the required PM Reduction Mechanism and Method for Managing PM Emissions specified in Appendix B of the Consent Decree.
- Cabot completed the relevant daily visual assessments and maintained a record of the results of each such assessment.
- Cabot developed and maintained a record of the results of each of the required daily visual assessments and associated Method 9 observations, when applicable.

- *Paragraph 33 and Appendix C - Particulate Emissions Best Management Practices Control Plan*

Cabot implemented the Particulate Emissions Best Management Practices Control Plan set forth in Appendix C of the Consent Decree, to the extent required during the reporting period.

- *Paragraph 34 and Appendix D - PM Early Warning System*



**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**VILLE PLATTE PLANT**

**REPORTING PERIOD: JULY 1, 2019 – DECEMBER 31, 2019**

Cabot maintained compliance with applicable requirements of the Consent Decree related to the PM Early Warning System throughout the reporting period. During the reporting period, Cabot operated each PM Early Warning System at all times of Heat Load Operation and Process System Operation, except during system breakdowns, repairs, maintenance, calibration checks, and zero and span adjustments of the applicable system, and for each PM Early Warning System.

During the reporting period, Cabot achieved a data availability of greater than 95% based on a quarterly average of the operating time of the emission unit or activity being monitored, and therefore, achieved full compliance with the minimum degree of availability requirements of the Consent Decree. In addition, in response to any alarm triggered during the reporting period for any PM Early Warning System at the facility, Cabot investigated the cause of the alarm as expeditiously as practicable and performed the required sequence of tasks to respond to the alarm.

On each Operating Day in this reporting period, Cabot conducted a visual review of the recorded data for each PM Early Warning System to identify trends in relative PM emissions.

Cabot also conducted routine maintenance during the reporting period in accordance with manufacturer's recommendations as addressed within the provisions in Paragraphs D.8a and D.8b of the Consent Decree.

- e. All CEMS data collected for each Process System, from the time any Emissions Limit in Sections VI (SO<sub>2</sub> Control Technology, Emissions Limits, and Monitoring Requirements) and VII (NO<sub>x</sub> Control Technology, Emissions Limits, and Monitoring Requirements) is exceeded until compliance is achieved, and an explanation of any periods of downtime of such CEMS.***

- *Paragraph 20 - SO<sub>2</sub> Monitoring Requirements*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until December 31, 2022.

- *Paragraph 29 - NO<sub>x</sub> Monitoring Requirements*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until December 31, 2022.

- f. A copy of the protocol for any PM stack tests performed in accordance with the requirements of Paragraph 31***

- *Paragraph 31 - PM Stack Testing*

Pursuant to the terms of the Second Amendment of the Consent Decree, compliance with these requirements is not required until 180 days from December 31, 2022, or June 29, 2023.

- g. All PM Early Warning System data collected, from the time a PM Early Warning System alarm is triggered until the PM Early Warning System data have returned to normal operating ranges, below levels triggering an alarm condition, and an explanation of any periods of PM Early Warning System downtime***

Data collected for each event in which a PM Early Warning System alarm was triggered during this reporting period are presented in **Attachment 1**.

CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

**VILLE PLATTE PLANT**

REPORTING PERIOD: **JULY 1, 2019 – DECEMBER 31, 2019**

A summary of PM Early Warning System downtime that occurred during unit operations, including required explanations for each period of downtime, is presented in **Attachment 2**.

***h. A description of any violation of the requirements of this Consent Decree, including any violation resulting from Malfunctions, any exceedance of an Emissions Limit, any exceedance of a 30-day rolling Average Sulfur Content Weight Percent or 365-day Rolling Average Weight Percent, or any failure to install, commence operation or Continuously Operate and Control Technology or any PM Early Warning System, which includes:***

- i. the date and duration of, and the quantity of any emissions related to, the violation;*
- ii. a full explanation of the primary root cause and any other significant contributing cause(s) of the violation;*
- iii. a root cause analysis of all reasonable interim and long-term remedial steps or corrective actions, including all design, operation, and maintenance changes consistent with good engineering practices, if any, that could be taken to reduce or eliminate the probability of recurrence of such violation, and, if not already completed, a schedule for its (their) implementation, or, if Defendant concludes that remedial steps or corrective actions should not be conducted, the basis for that conclusion.*

Cabot is not aware of any violation of the requirements of the Consent Decree during this reporting period.

***i. If no violations occurred during a reporting period, include a statement that no violations occurred.***

Cabot is not aware of any violation of the requirements of the Consent Decree during this reporting period.

***j. A description of the status of any permit applications and any proposed SIP revisions required under this Consent Decree***

Cabot was not required under the Consent Decree to submit any permit applications or any proposed SIP revision during this reporting period.

***k. A summary of all actions undertaken, and Project Dollars expended during the reporting period, as well as any cumulative Project Dollars expended, and the estimated environmental benefits achieved to date in satisfaction of the requirements of Section V (Environmental Mitigation) and Appendix A.***

A project completion notification was filed with the US EPA on November 2, 2015 by Cabot.

**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**VILLE PLATTE PLANT**

**REPORTING PERIOD: JULY 1, 2019 – DECEMBER 31, 2019**

**ATTACHMENT 1**

**PM EARLY WARNING SYSTEM DATA COLLECTED DURING HIGH PM EMISSIONS EVENTS**

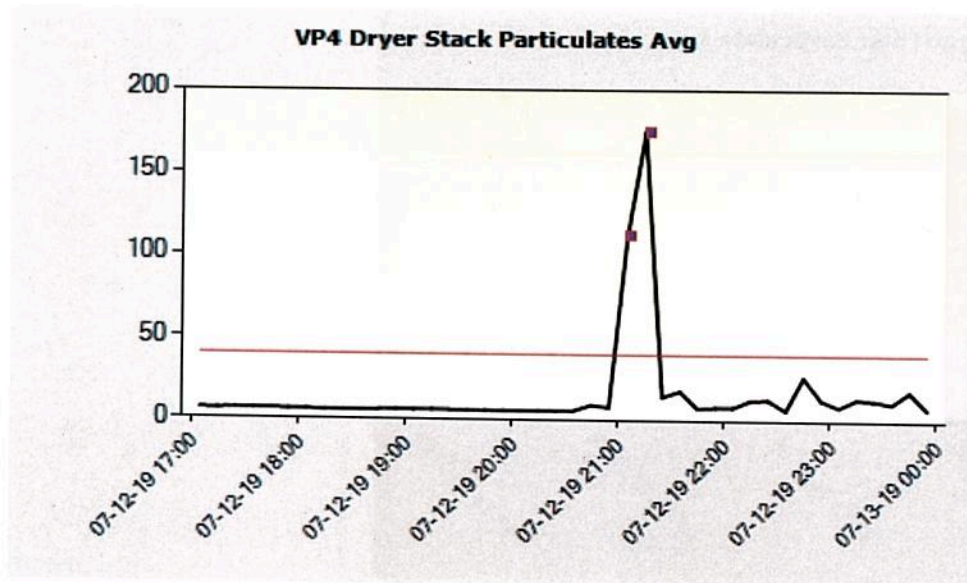


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

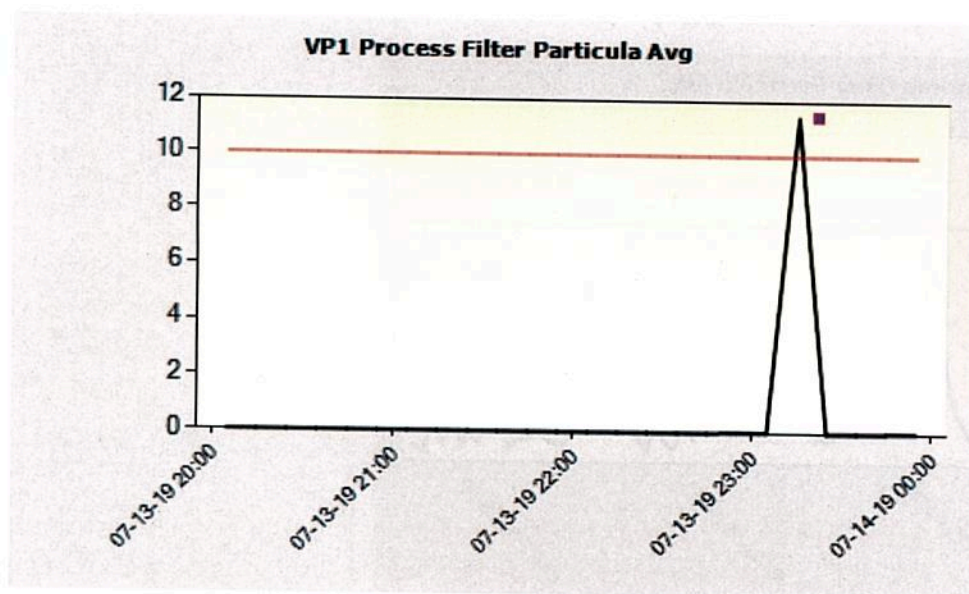
VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2019 – DECEMBER 31, 2019

VP4 Dryer 7/12/2019, 21:05 to 21:15. No leak detected. Trend decreased below action level.



VP1 Process Filter 7/13/2019, 23:15. No leaks detected. Trend returned to normal.

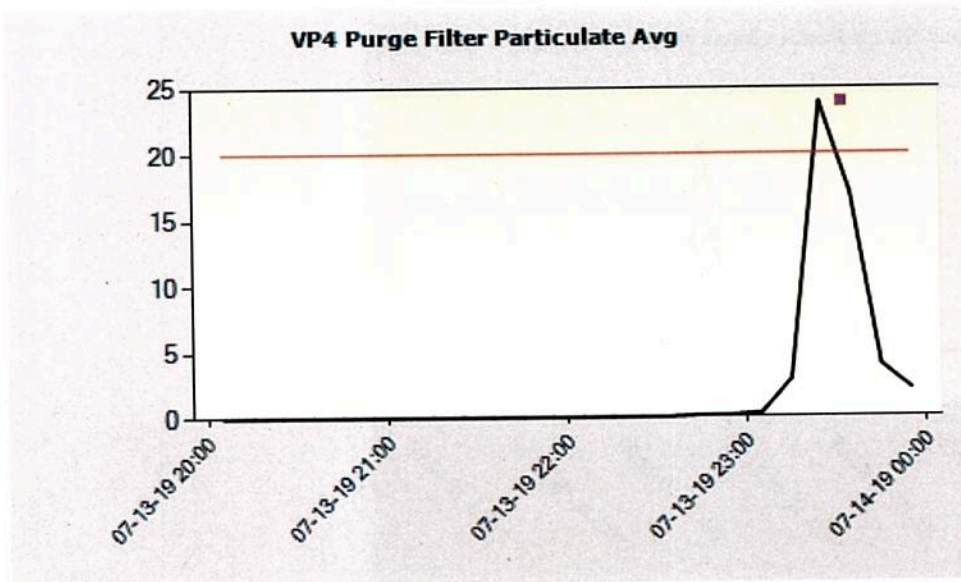


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

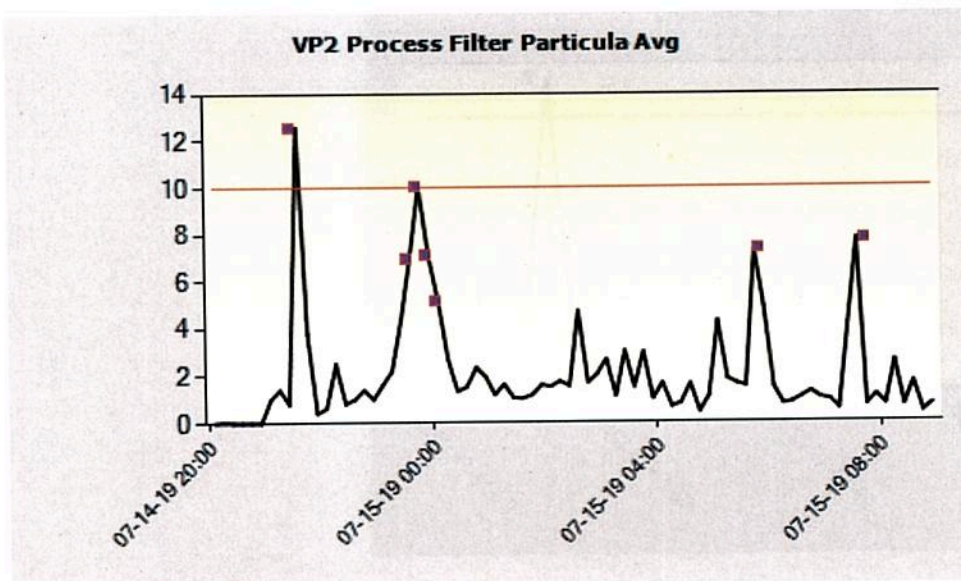
VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2019 – DECEMBER 31, 2019

VP4 Purge Filter, 7/13/2019, 23:25. No leaks detected. Trend returned to normal.



VP2 Process Filter 7/14/2019, 21:35 to 7/15/19, 07:35. Pipe cleaner samples were clear. No visible emissions observed during daylight. Alarms received during heavy rains.

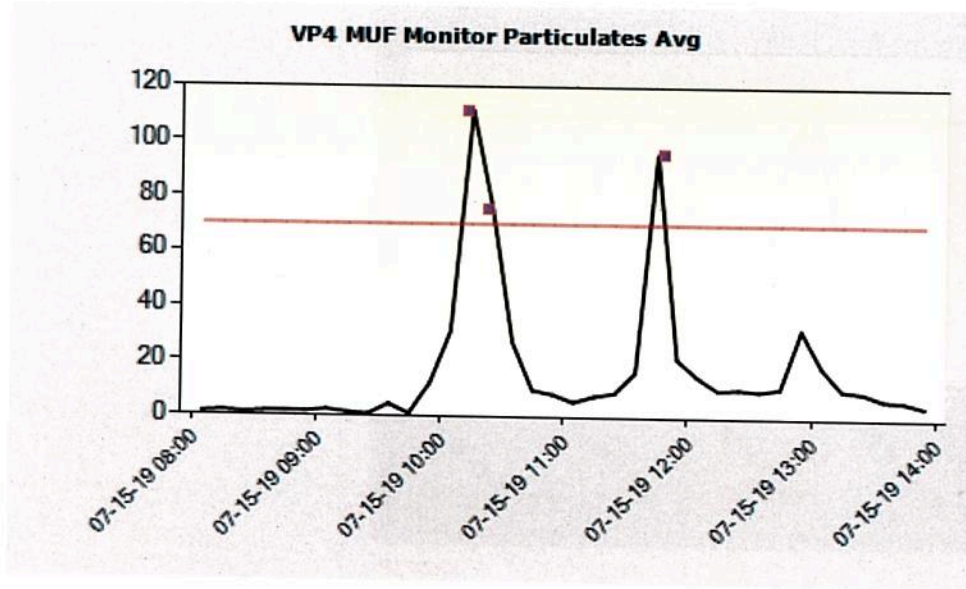


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

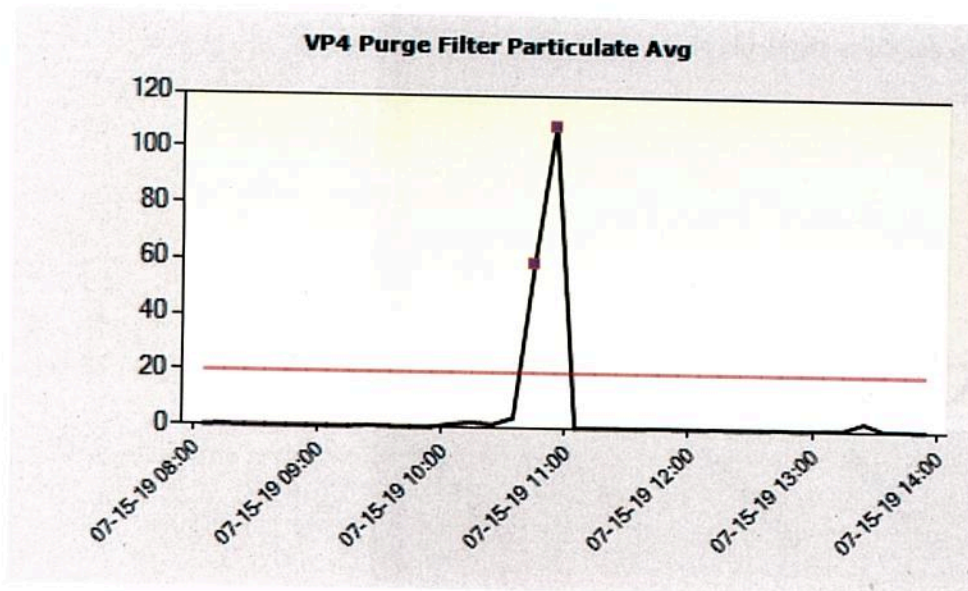
VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2019 – DECEMBER 31, 2019

VP4 Main Unit Filter (MUF), 7/15/2019, 10:15 to 11:45. No visible emissions observed. Alarms received following unit start-up and during heavy rain. Trends returned to normal.



VP4 Purge Filter, 7/15/2019, 10:45 to 10:55. Alarms received following unit start-up. No visible emissions observed, pipe cleaner sample was clean, trend returned to normal.



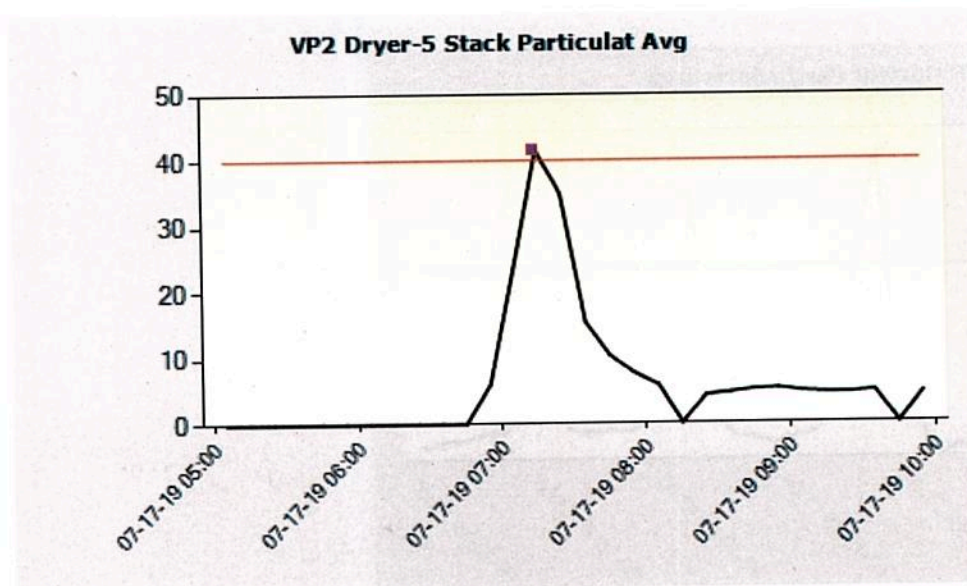


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

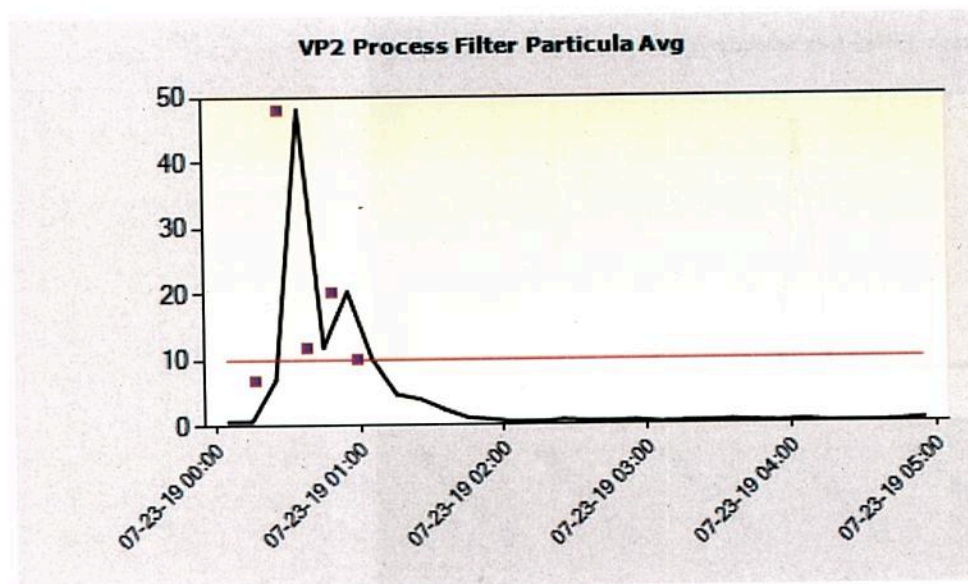
**VILLE PLATTE PLANT**

REPORTING PERIOD: **JULY 1, 2019 – DECEMBER 31, 2019**

VP2 #5 Dryer, 7/17/2019, 07:15. Alarm received at unit start-up. No visible emissions observed.



VP2 Process Filter, 7/23/2019, 00:25 to 01:05. Small leak detected via pipe cleaner sample. Leak was addressed immediately; follow-up pipe cleaner sample was clean.

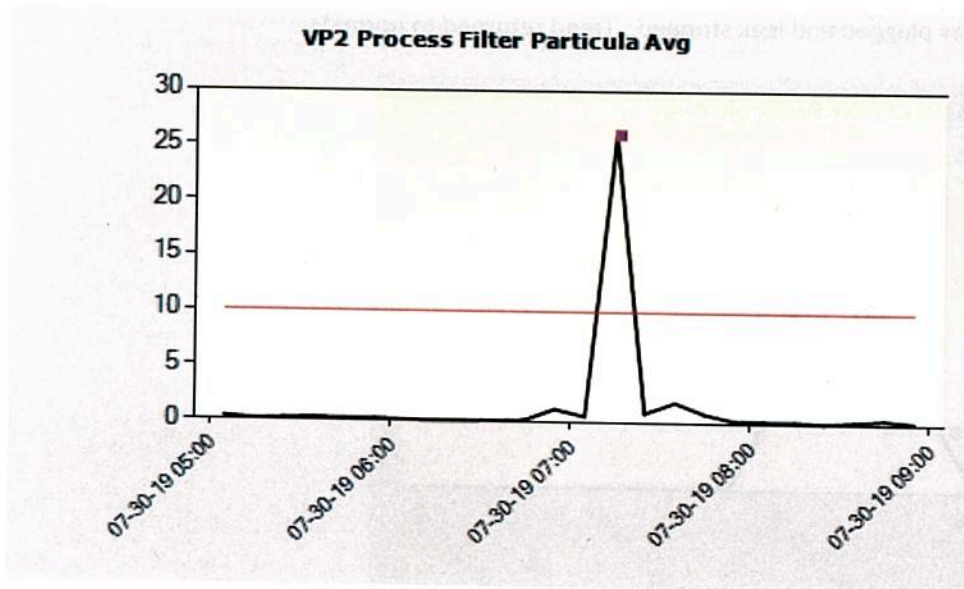


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

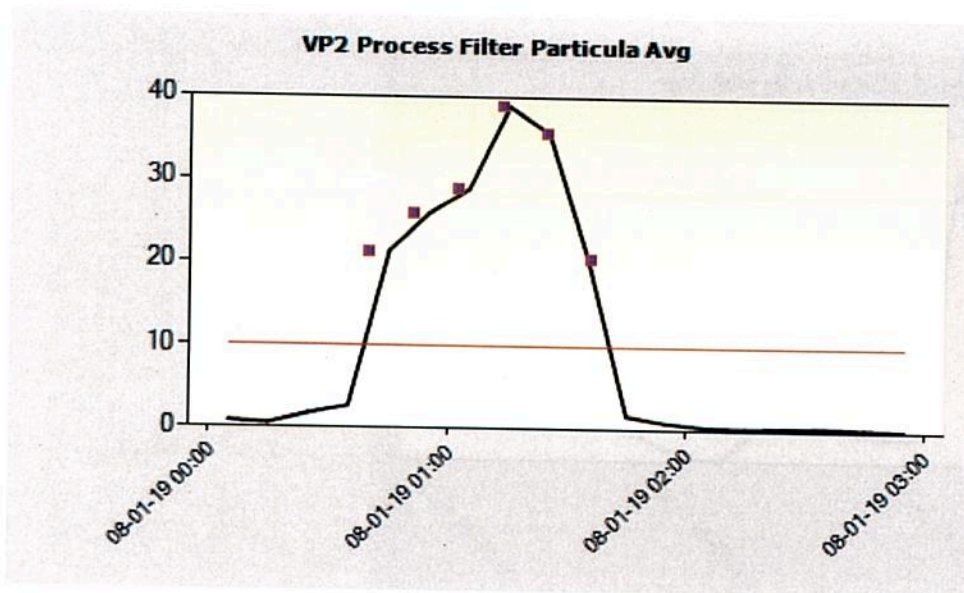
VILLE PLATTE PLANT

REPORTING PERIOD: JULY 1, 2019 – DECEMBER 31, 2019

VP2 Process Filter, 7/30/2019, 07:15. Alarm received during heavy rainfall. No visible emissions observed.



VP2 Process Filter, 8/1/2019, 00:45 to 01:35. Leak detected via pipe cleaner sample. Leak was addressed by plugging a bag port on row #15; follow-up pipe cleaner sample was clean. Trend returned to normal.

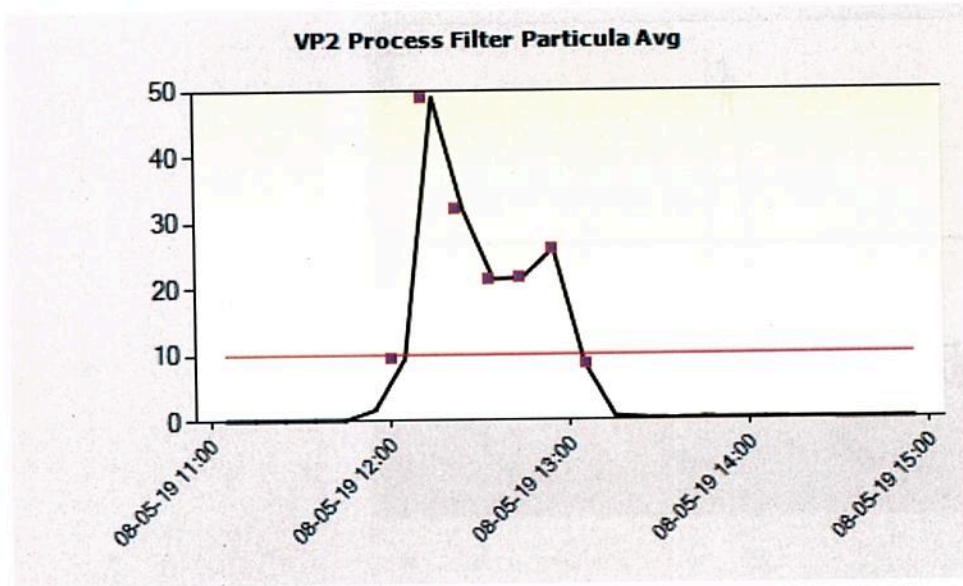


**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

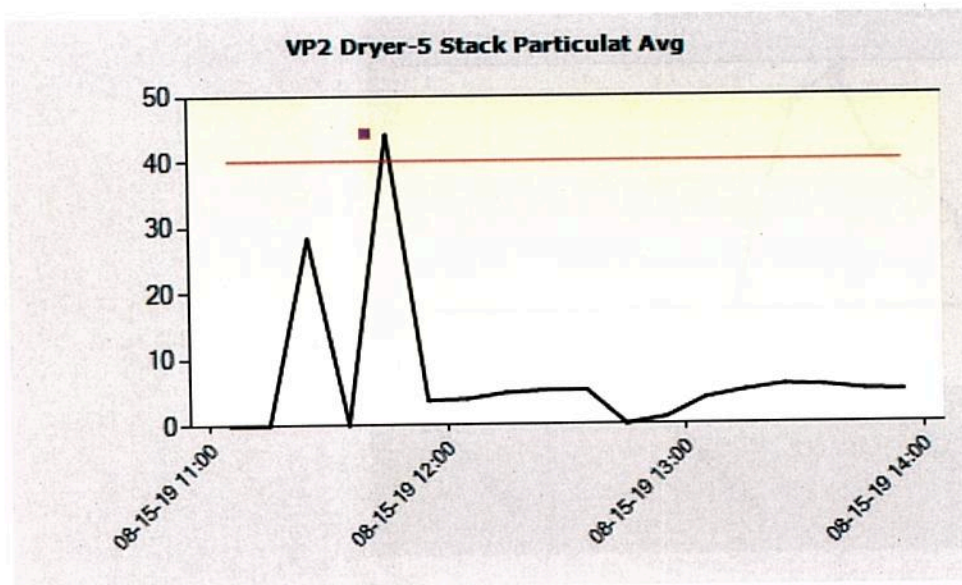
**VILLE PLATTE PLANT**

**REPORTING PERIOD: JULY 1, 2019 – DECEMBER 31, 2019**

VP2 Process Filter, 8/5/2019, 12:05 to 13:05. No visible emissions observed. Pipe cleaner sample indicated a small leak. Bag port hole in row #17 was plugged and leak stopped. Trend returned to normal.



VP2 #5 Dryer, 8/15/2019, 11:45. No visible emissions observed. Alarm possibly due to north dryer discharge screw going down.



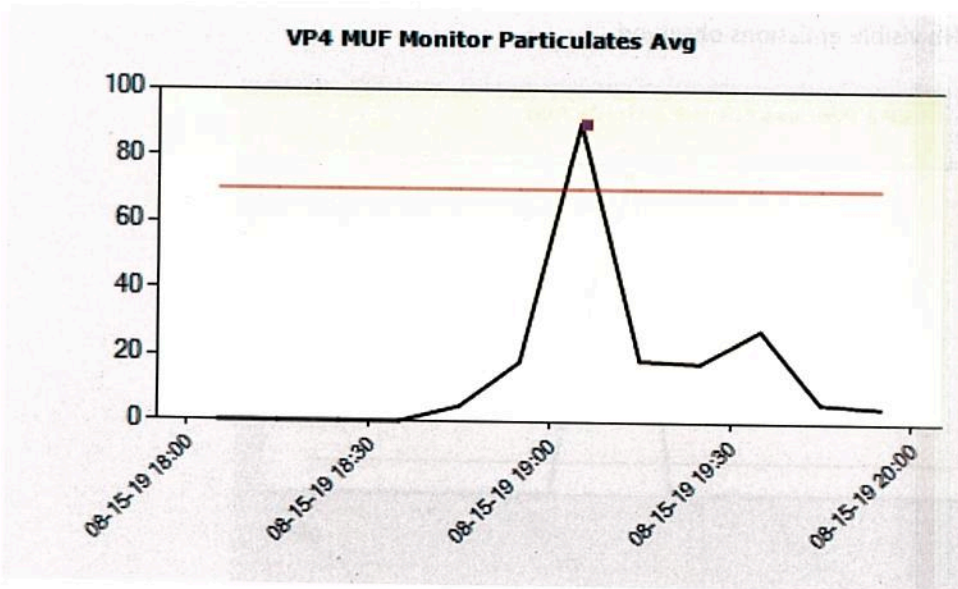


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

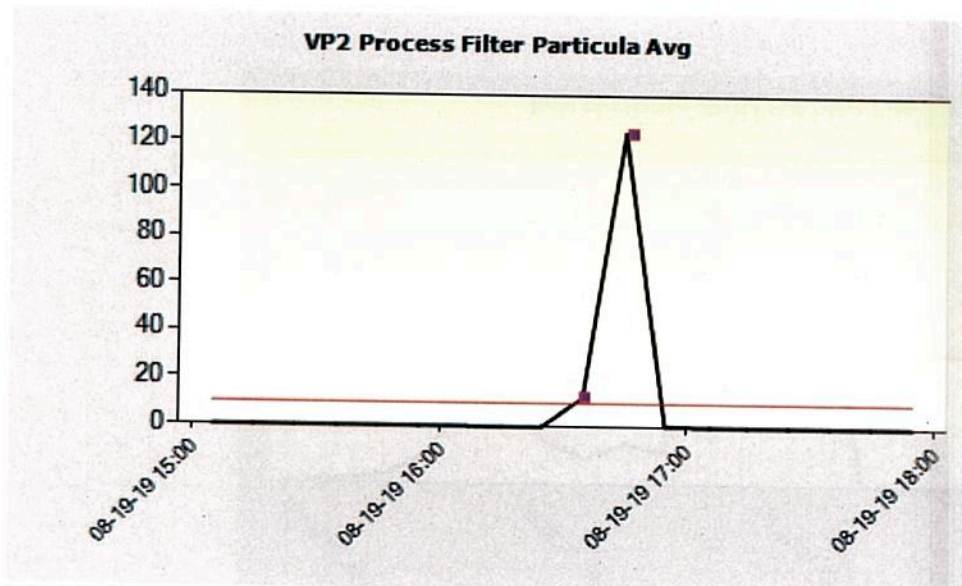
VILLE PLATTE PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

VP4 MUF, 8/15/2019, 19:05. Alarm received when placing unit on make load. No visible emissions observed.



VP2 Process Filter, 8/19/2019, 16:35 to 16:45. Alarms received during heavy rains. No visible emissions observed.

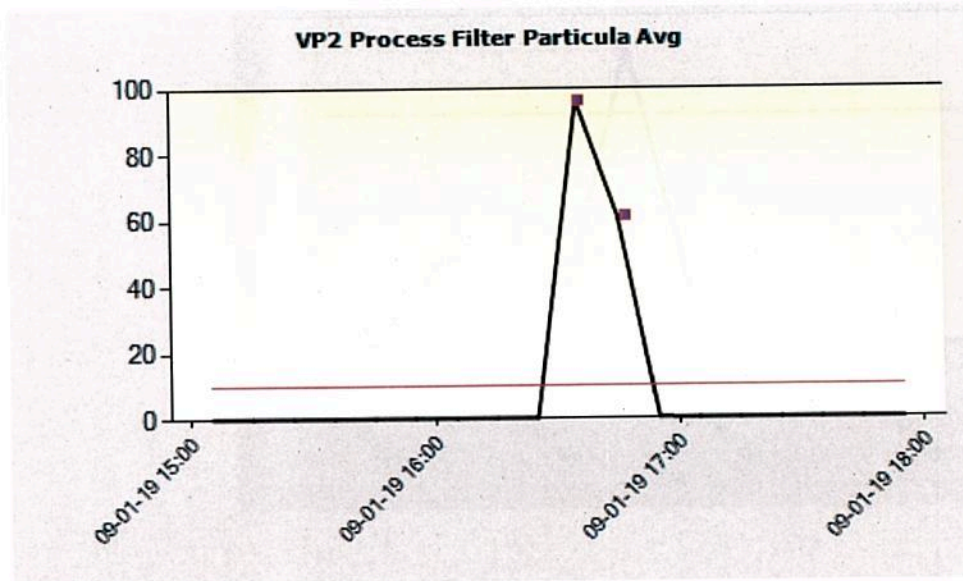


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

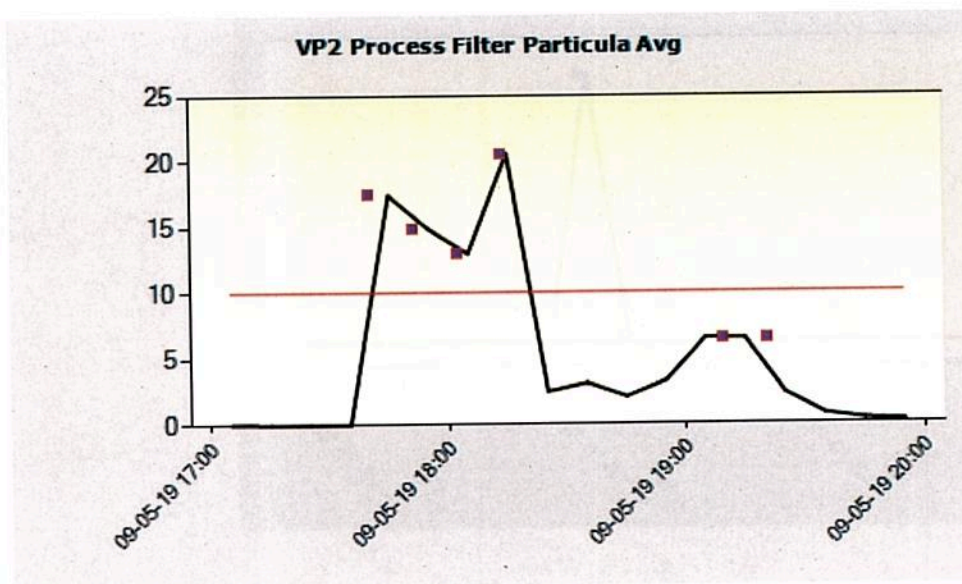
VILLE PLATTE PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

VP2 Process Filter, 9/1/2019, 16:35 to 16:45. Alarms received during heavy rainfall. Trends immediately returned to normal. No visible emissions observed.



VP2 Process Filter, 9/5/2019, 17:45 to 19:15. Alarms received following power failure. No visible emissions observed.

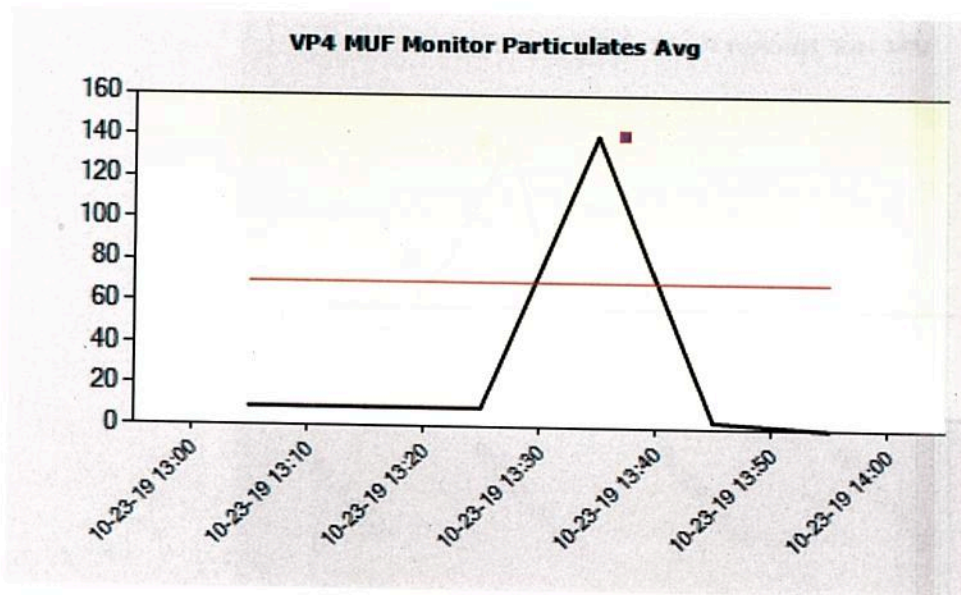


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

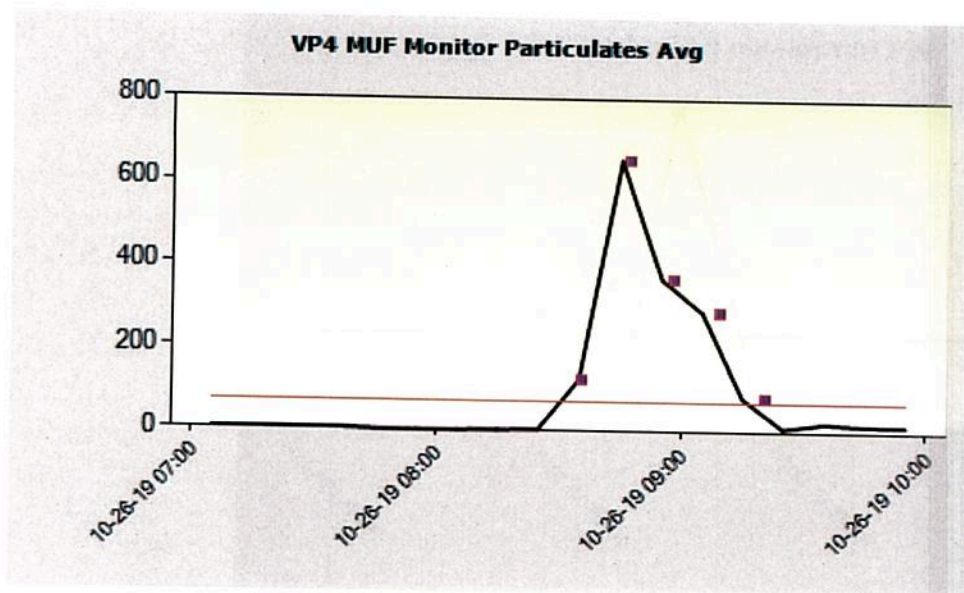
VILLE PLATTE PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

VP4 MUF, 10/23/2019, 13:35. Unit was on low warm-up (not on make load). Alarm attributed to issues with particulate monitor. Monitor was serviced.



VP4 MUF, 10/26/2019, 08:35 to 09:15. Alarms received when transitioning from make load to heat load. No visible emissions observed.



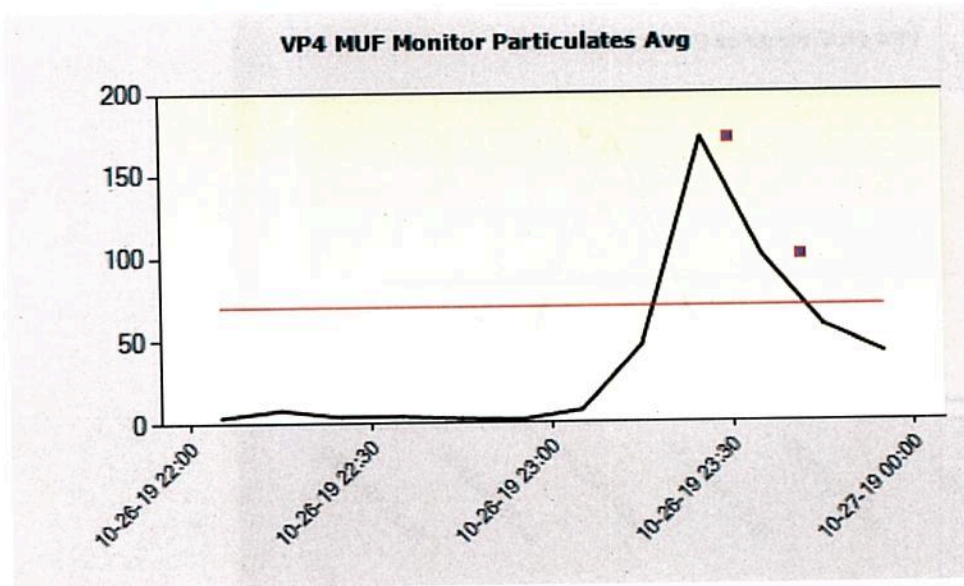


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

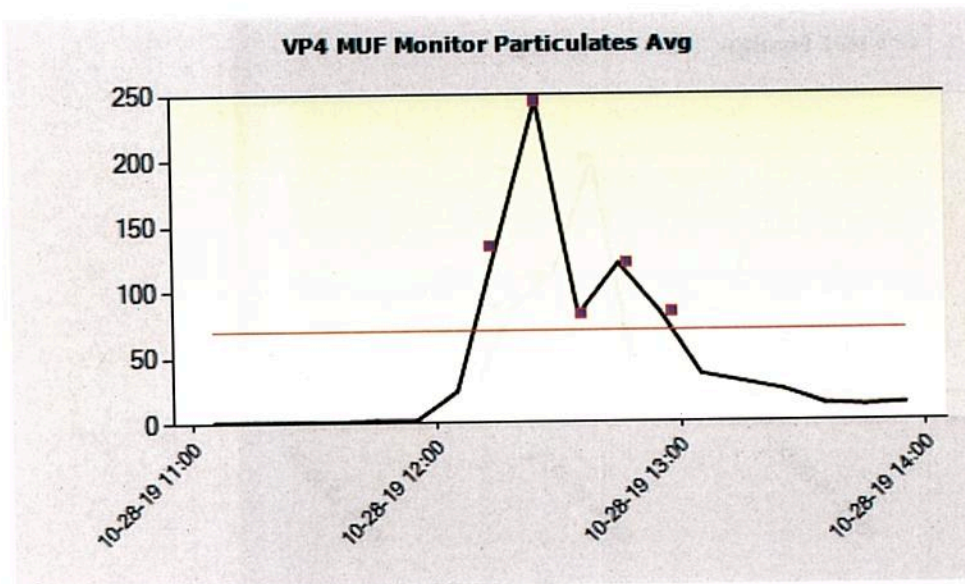
VILLE PLATTE PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

VP4 MUF, 10/26/2019, 23:25 to 23:35. Alarms received when taking unit from make load to heat load. Trend returned to normal.



VP4 MUF, 10/28/2019, 12:15 to 12:55. Alarms received when unit tripped to heat load. No visible emissions observed.

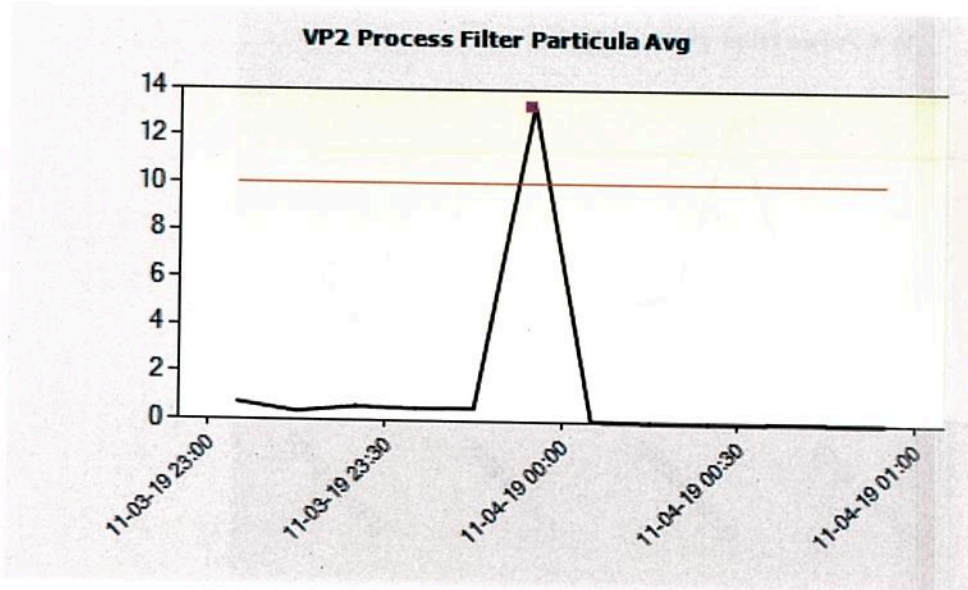


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

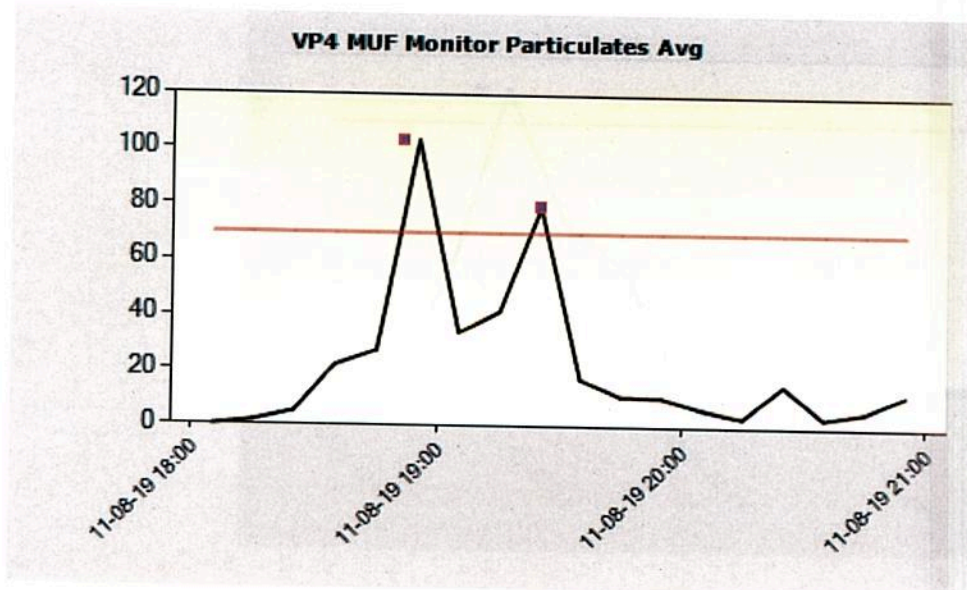
VILLE PLATTE PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

VP2 Process Filter, 11/3/2019, 23:55. Alarm received during unit shut down process.



VP4 MUF, 11/8/2019, 18:55 to 19:25. Alarms received while bringing unit up. Trend returned to normal.

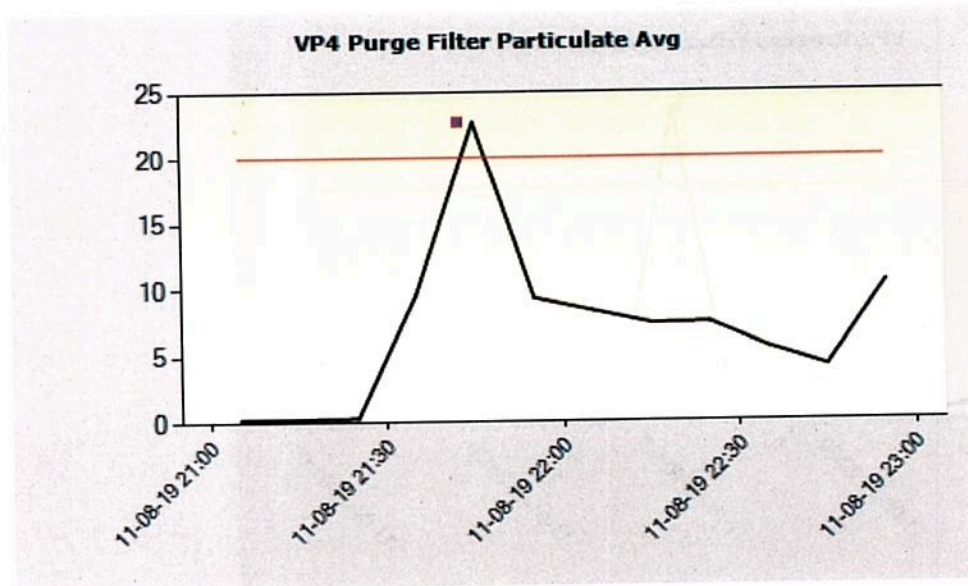


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

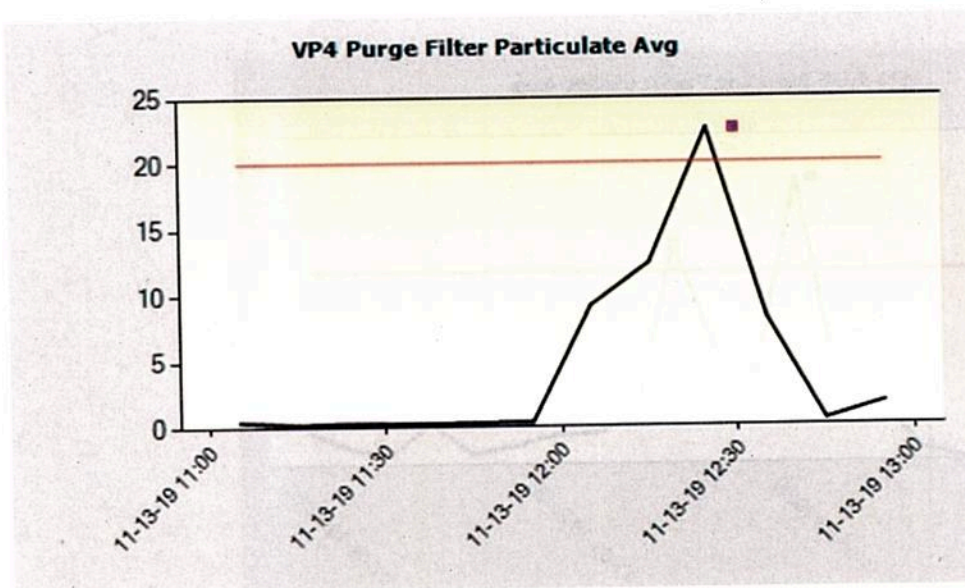
VILLE PLATTE PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

VP4 Purge Filter, 11/8/2019, 21:45. Pipe cleaner sample was clean. No leak detected.



VP4 Purge Filter, 11/13/2019, 12:25. Alarm received during unit start-up. No visible emissions observed.



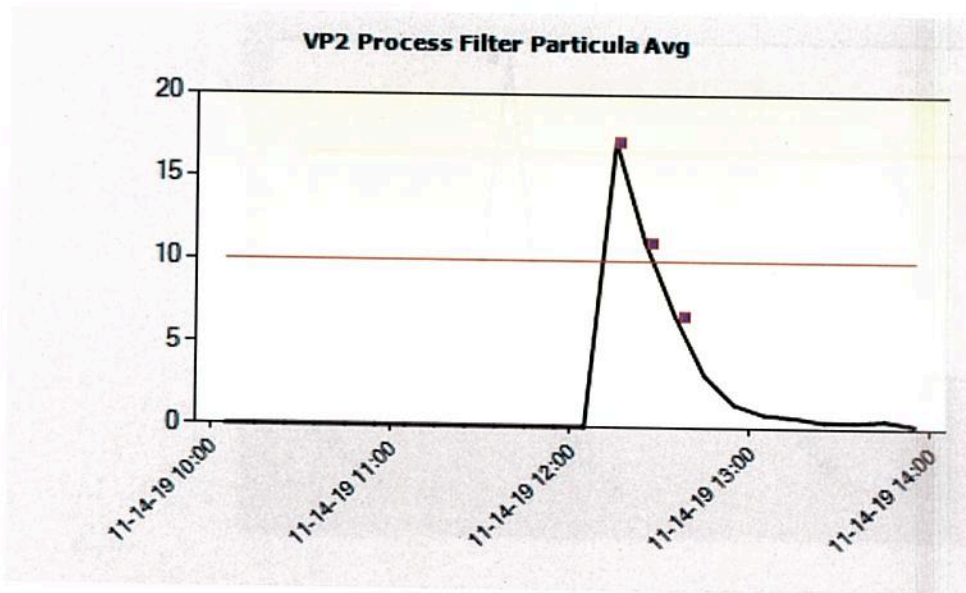


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

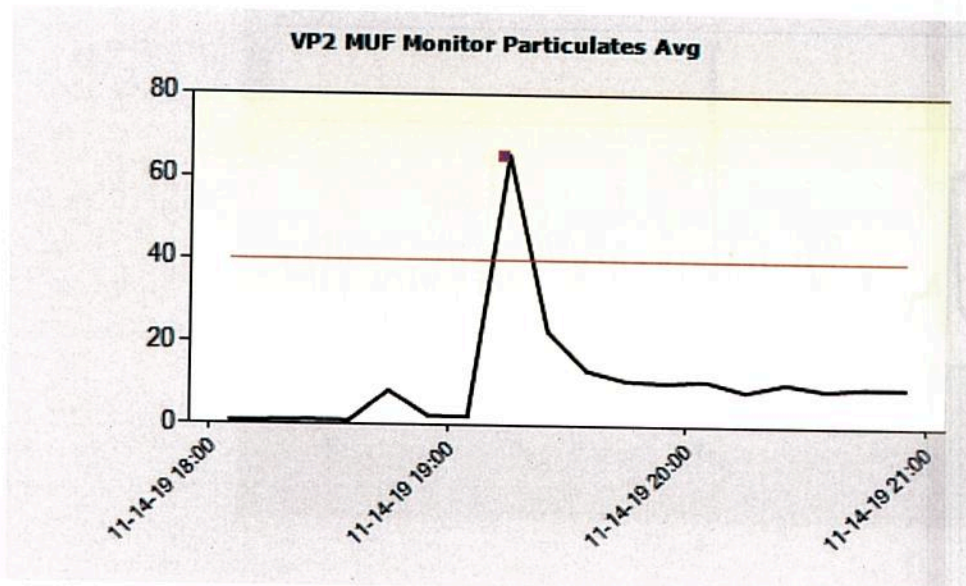
VILLE PLATTE PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

VP2 Process Filter, 11/14/2019, 12:15 to 12:35. Alarms received while bumping equipment prior to unit start-up. No visible emissions observed.



VP2 MUF, 11/14/2019, 19:15. Alarm received while starting unit. Flare was observed. No leak detected and trend returned to normal.

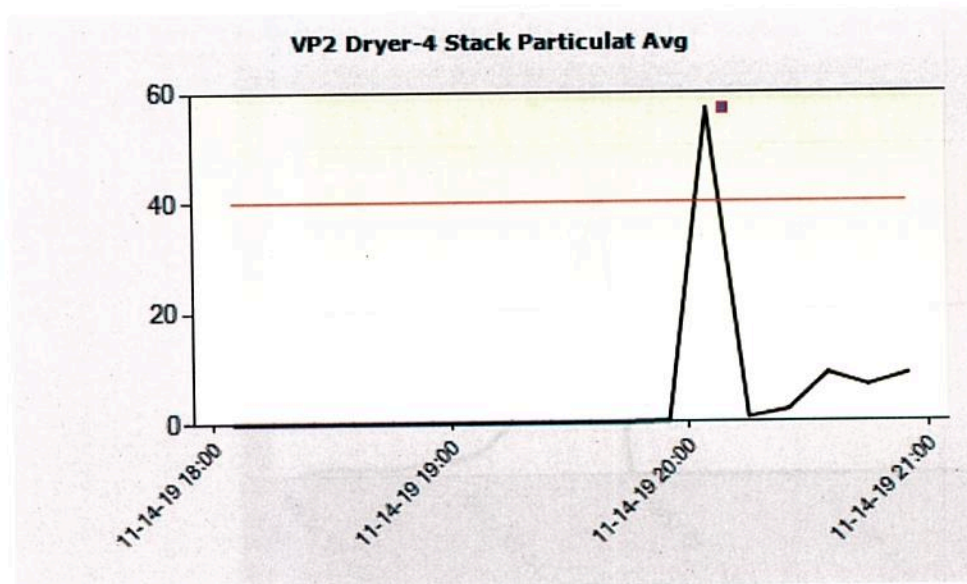


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

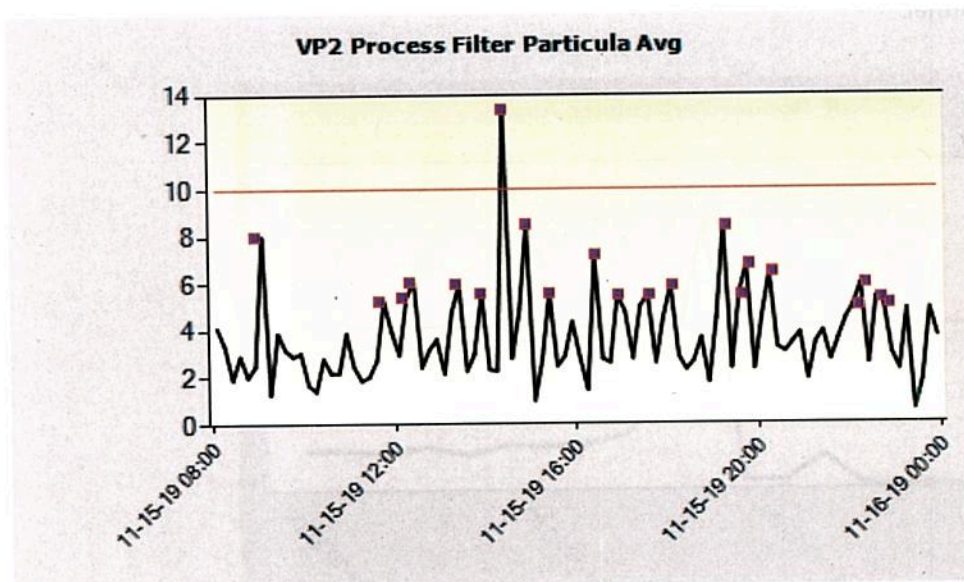
VILLE PLATTE PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

VP2 #4 Dryer, 11/14/2019, 20:05. Alarm received when switching to tail gas. Trend returned to normal.



VP2 Process Filter, 11/15/2019, 09:05 to 22:45. One alarm above alarm action level. Pipe cleaner samples indicated possible leak. Two bags were plugged. No visible emissions observed.

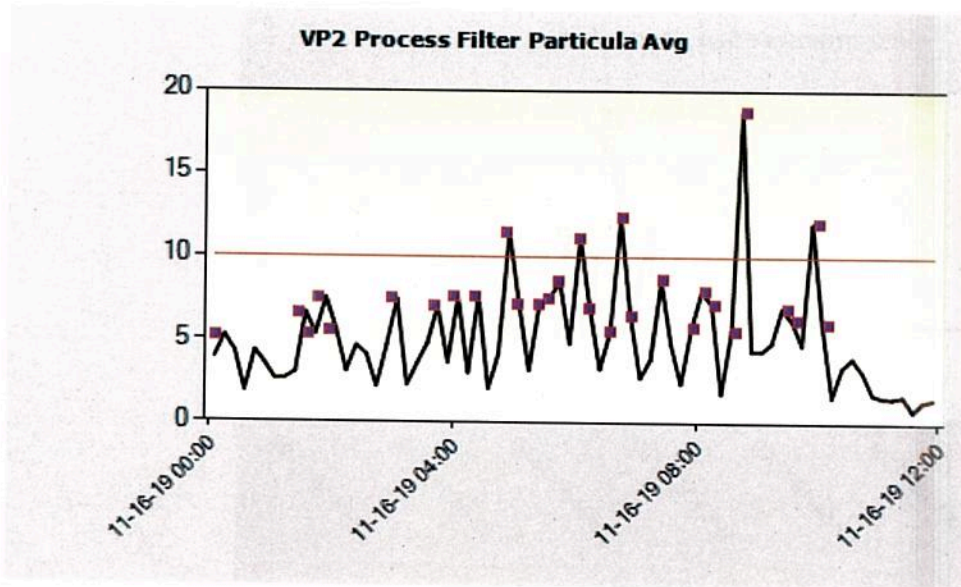


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

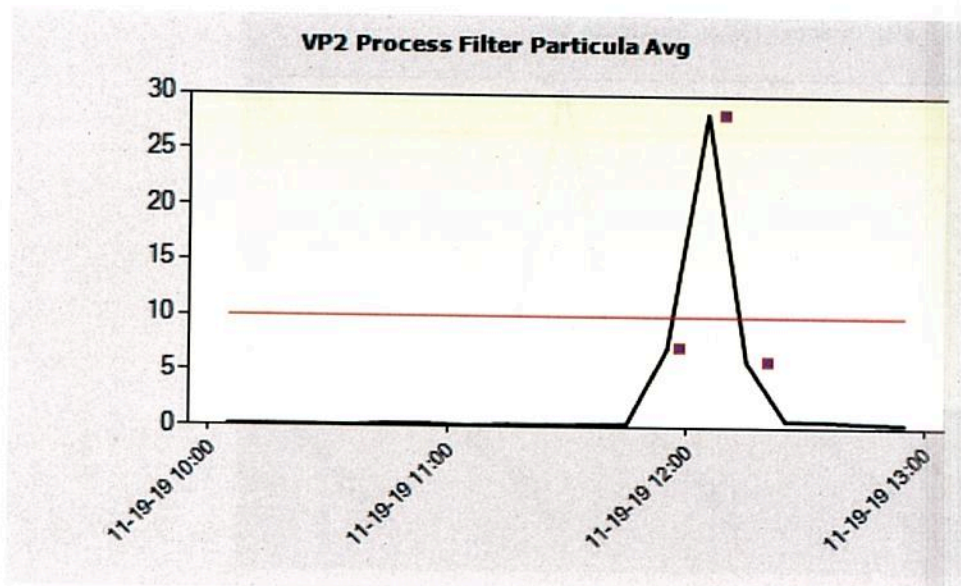
VILLE PLATTE PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

VP2 Process Filter, 11/16/2019, 00:15 to 10:05. No visible emissions observed. Responded by isolating two rows of bags in filter. Trend returned to normal.



VP2 Process Filter, 11/19/2019, 11:55 to 12:15. Alarms attributed to fallen bag in filter. Port was plugged and leak stopped.



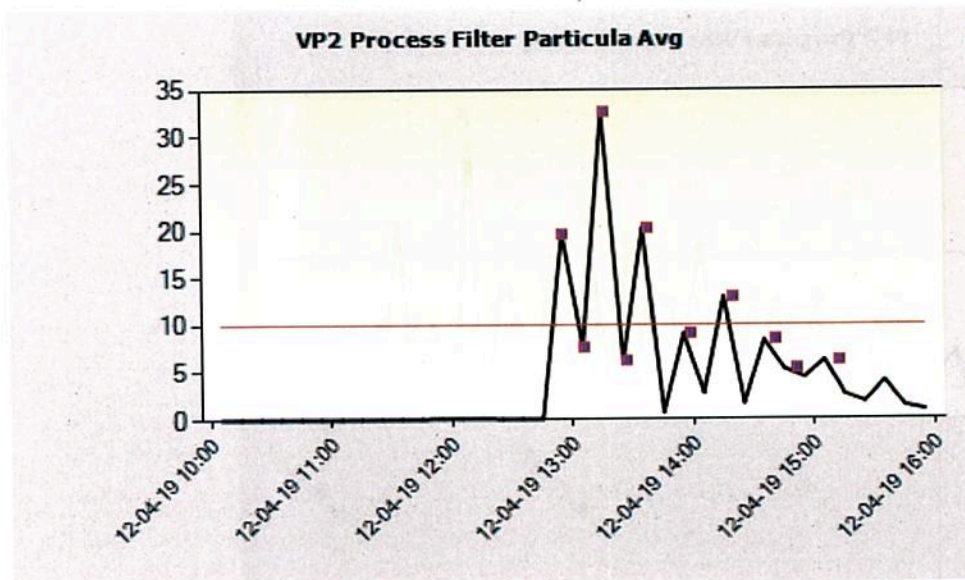


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

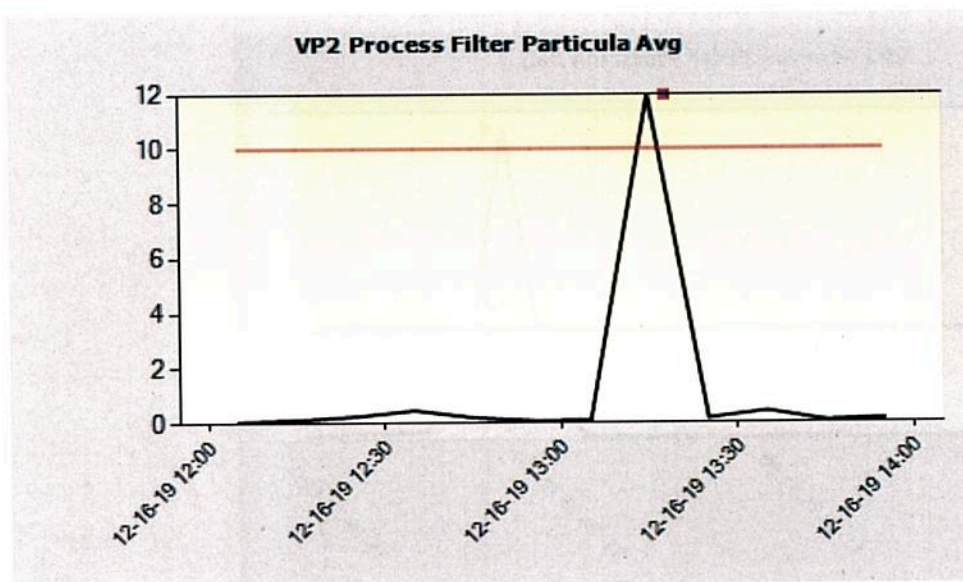
VILLE PLATTE PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

VP2 Process Filter, 12/4/2019, 12:55 to 15:05. Alarms due to fallen bag. Responded by plugging port and the leak stopped.



VP2 Process Filter, 12/16/19, 13:15. Alarm received during heavy rainfall. No visible emissions observed. Trend returned to normal.

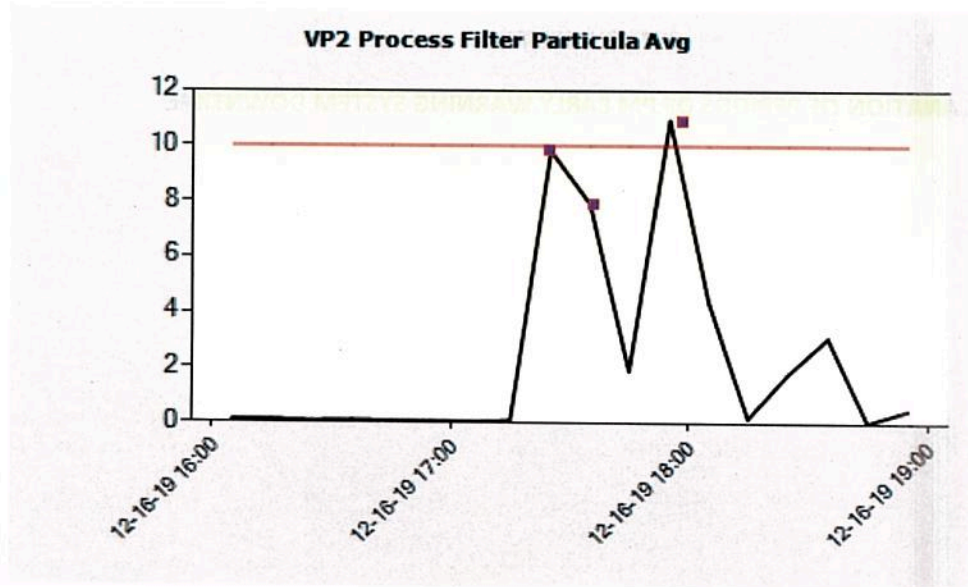


CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT

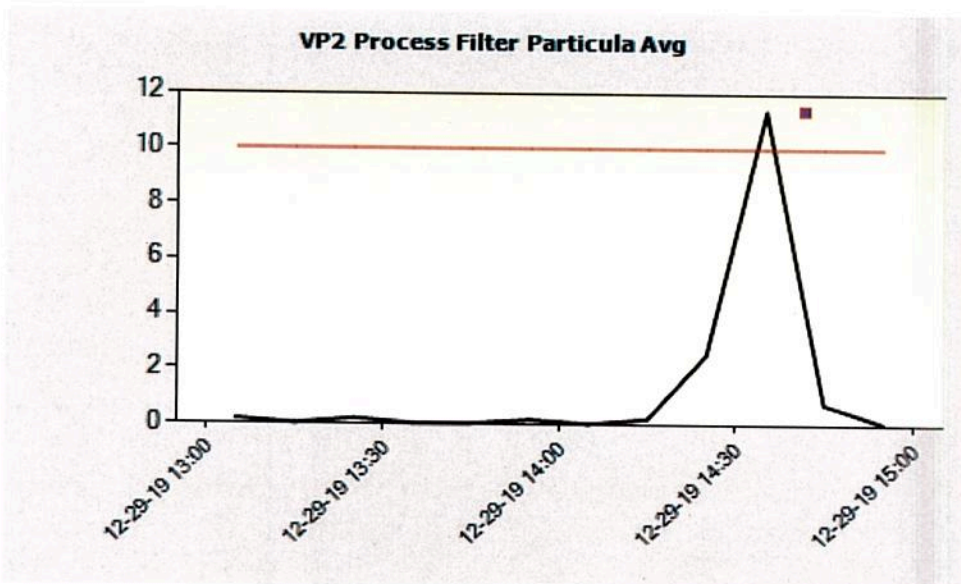
VILLE PLATTE PLANT

REPORTING PERIOD: July 1, 2019– December 31, 2019

VP2 Process Filter, 12/16/2019, 17:25 to 17:55. Alarms received during heavy rainfall. No visible emissions observed.



VP2 Process Filter, 12/29/2019, 14:35. Alarm received during heavy rainfall. No visible emissions observed.



**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**VILLE PLATTE PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

**ATTACHMENT 2**

**EXPLANATION OF PERIODS OF PM EARLY WARNING SYSTEM DOWNTIME**



**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**VILLE PLATTE PLANT**

**REPORTING PERIOD:** July 1, 2019– December 31, 2019

**PMEWS Data Availability Detail: 01-Jul-2019 to 31-Dec-2019**

Unit	Source	Start Time	End Time	Duration Hours	Alarm Type	Status Code	Status Description	Consent Decree
VP-1	Dryer	14-Jul-2019 17:14	14-Jul-2019 17:15	0.02	General	16	No Response from Sensor	Y
VP-1	Dryer	21-Aug-2019 02:39	21-Aug-2019 02:50	0.18	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-1	Dryer	06-Sep-2019 04:22	06-Sep-2019 08:21	3.98	General	16	No Response from Sensor	Y
VP-1	Dryer	04-Dec-2019 04:35	04-Dec-2019 05:14	0.65	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-1	MUF	14-Jul-2019 17:14	14-Jul-2019 17:19	0.08	General	16	No Response from Sensor	Y
VP-1	MUF	06-Sep-2019 04:22	06-Sep-2019 08:21	3.98	General	16	No Response from Sensor	Y
VP-1	MUF	06-Nov-2019 11:01	06-Nov-2019 11:02	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
VP-1	Process Filter	14-Jul-2019 11:45	14-Jul-2019 16:36	4.85	General	16	No Response from Sensor	Y
VP-1	Process Filter	14-Jul-2019 16:37	14-Jul-2019 18:17	1.67	General	16	No Response from Sensor	Y
VP-1	Process Filter	14-Jul-2019 18:23	14-Jul-2019 18:24	0.02	General	16	No Response from Sensor	Y
VP-1	Process Filter	17-Jul-2019 08:40	17-Jul-2019 08:41	0.02	General	16	No Response from Sensor	Y

**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**VILLE PLATTE PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

Unit	Source	Start Time	End Time	Duration Hours	Alarm Type	Status Code	Status Description	Consent Decree
VP-1	Process Filter	06-Nov-2019 11:01	06-Nov-2019 11:02	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
VP-1	Purge Filter	14-Jul-2019 11:20	14-Jul-2019 11:22	0.03	General	16	No Response from Sensor	Y
VP-1	Purge Filter	14-Jul-2019 11:27	14-Jul-2019 11:31	0.07	General	16	No Response from Sensor	Y
VP-1	Purge Filter	14-Jul-2019 11:32	14-Jul-2019 11:33	0.02	General	16	No Response from Sensor	Y
VP-1	Purge Filter	14-Jul-2019 11:36	14-Jul-2019 11:37	0.02	General	16	No Response from Sensor	Y
VP-1	Purge Filter	14-Jul-2019 11:45	14-Jul-2019 11:49	0.07	General	16	No Response from Sensor	Y
VP-1	Purge Filter	14-Jul-2019 11:50	14-Jul-2019 13:05	1.25	General	16	No Response from Sensor	Y
VP-1	Purge Filter	14-Jul-2019 13:11	14-Jul-2019 13:41	0.50	General	16	No Response from Sensor	Y
VP-1	Purge Filter	14-Jul-2019 13:47	14-Jul-2019 14:01	0.23	General	16	No Response from Sensor	Y
VP-1	Purge Filter	14-Jul-2019 14:07	14-Jul-2019 14:18	0.18	General	16	No Response from Sensor	Y
VP-1	Purge Filter	14-Jul-2019 14:22	14-Jul-2019 14:36	0.23	General	16	No Response from Sensor	Y
VP-1	Purge Filter	14-Jul-2019 14:45	14-Jul-2019 16:36	1.85	General	16	No Response from Sensor	Y

**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**VILLE PLATTE PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

nit	Source	Start Time	End Time	Duration Hours	Alarm Type	Status Code	Status Description	Consent Decree
VP-1	Purge Filter	14-Jul-2019 16:38	14-Jul-2019 17:15	0.62	General	16	No Response from Sensor	Y
VP-1	Purge Filter	14-Jul-2019 17:40	14-Jul-2019 18:17	0.62	General	16	No Response from Sensor	Y
VP-1	Purge Filter	17-Jul-2019 08:40	17-Jul-2019 08:41	0.02	General	16	No Response from Sensor	Y
VP-2	Dryer-1	21-Aug-2019 02:39	21-Aug-2019 02:50	0.18	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	Dryer-1	04-Dec-2019 04:35	04-Dec-2019 05:14	0.65	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	Dryer-2	21-Aug-2019 02:39	21-Aug-2019 02:50	0.18	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	Dryer-2	04-Dec-2019 04:35	04-Dec-2019 05:14	0.65	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	Dryer-3	21-Aug-2019 02:39	21-Aug-2019 02:50	0.18	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	Dryer-3	04-Dec-2019 04:35	04-Dec-2019 05:14	0.65	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	Dryer-4	21-Aug-2019 02:39	21-Aug-2019 02:50	0.18	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	Dryer-4	04-Dec-2019 04:35	04-Dec-2019 05:14	0.65	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-2	Dryer-5	14-Jul-2019 16:50	14-Jul-2019 17:04	0.23	General	16	No Response from Sensor	Y



**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**VILLE PLATTE PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

Unit	Source	Start Time	End Time	Duration Hours	Alarm Type	Status Code	Status Description	Consent Decree
VP-2	MUF	14-Jul-2019 17:14	14-Jul-2019 17:19	0.08	General	16	No Response from Sensor	Y
VP-2	MUF	06-Sep-2019 04:22	06-Sep-2019 08:21	3.98	General	16	No Response from Sensor	Y
VP-2	Process Filter	14-Jul-2019 17:14	14-Jul-2019 17:19	0.08	General	16	No Response from Sensor	Y
VP-2	Process Filter	06-Sep-2019 04:22	06-Sep-2019 08:21	3.98	General	16	No Response from Sensor	Y
VP-2	Purge Filter	14-Jul-2019 17:14	14-Jul-2019 17:19	0.08	General	16	No Response from Sensor	Y
VP-2	Purge Filter	06-Sep-2019 04:22	06-Sep-2019 08:21	3.98	General	16	No Response from Sensor	Y
VP-3	Dryer	14-Jul-2019 11:41	14-Jul-2019 11:42	0.02	General	16	No Response from Sensor	Y
VP-3	Dryer	14-Jul-2019 11:44	14-Jul-2019 11:49	0.08	General	16	No Response from Sensor	Y
VP-3	Dryer	14-Jul-2019 11:50	14-Jul-2019 16:36	4.77	General	16	No Response from Sensor	Y
VP-3	Dryer	14-Jul-2019 16:37	14-Jul-2019 18:17	1.67	General	16	No Response from Sensor	Y
VP-3	Dryer	14-Jul-2019 18:23	14-Jul-2019 18:24	0.02	General	16	No Response from Sensor	Y
VP-3	Dryer	17-Jul-2019 08:40	17-Jul-2019 08:41	0.02	General	16	No Response from Sensor	Y

**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**VILLE PLATTE PLANT**

**REPORTING PERIOD:** July 1, 2019– December 31, 2019

Unit	Source	Start Time	End Time	Duration Hours	Alarm Type	Status Code	Status Description	Consent Decree
VP-3	Dryer	21-Aug-2019 02:39	21-Aug-2019 02:50	0.18	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-3	Dryer	06-Nov-2019 11:01	06-Nov-2019 11:02	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
VP-3	Dryer	04-Dec-2019 04:35	04-Dec-2019 05:14	0.65	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-3	MUF	14-Jul-2019 11:23	14-Jul-2019 11:24	0.02	General	16	No Response from Sensor	Y
VP-3	MUF	14-Jul-2019 11:30	14-Jul-2019 11:31	0.02	General	16	No Response from Sensor	Y
VP-3	MUF	14-Jul-2019 11:44	14-Jul-2019 16:36	4.87	General	16	No Response from Sensor	Y
VP-3	MUF	14-Jul-2019 16:37	14-Jul-2019 18:17	1.67	General	16	No Response from Sensor	Y
VP-3	MUF	14-Jul-2019 18:23	14-Jul-2019 18:24	0.02	General	16	No Response from Sensor	Y
VP-3	MUF	17-Jul-2019 08:40	17-Jul-2019 08:41	0.02	General	16	No Response from Sensor	Y
VP-3	MUF	06-Nov-2019 11:01	06-Nov-2019 11:02	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
VP-3	Process Filter	14-Jul-2019 11:42	14-Jul-2019 11:43	0.02	General	16	No Response from Sensor	Y
VP-3	Process Filter	14-Jul-2019 11:44	14-Jul-2019 16:36	4.87	General	16	No Response from Sensor	Y

**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**VILLE PLATTE PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

Unit	Source	Start Time	End Time	Duration Hours	Alarm Type	Status Code	Status Description	Consent Decree
VP-3	Process Filter	14-Jul-2019 16:38	14-Jul-2019 18:17	1.65	General	16	No Response from Sensor	Y
VP-3	Process Filter	14-Jul-2019 18:23	14-Jul-2019 18:24	0.02	General	16	No Response from Sensor	Y
VP-3	Process Filter	17-Jul-2019 08:40	17-Jul-2019 08:41	0.02	General	16	No Response from Sensor	Y
VP-3	Process Filter	06-Nov-2019 11:01	06-Nov-2019 11:02	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
VP-3	Purge Filter	14-Jul-2019 11:41	14-Jul-2019 11:42	0.02	General	16	No Response from Sensor	Y
VP-3	Purge Filter	14-Jul-2019 11:45	14-Jul-2019 11:49	0.07	General	16	No Response from Sensor	Y
VP-3	Purge Filter	14-Jul-2019 11:50	14-Jul-2019 16:36	4.77	General	16	No Response from Sensor	Y
VP-3	Purge Filter	14-Jul-2019 16:37	14-Jul-2019 18:17	1.67	General	16	No Response from Sensor	Y
VP-3	Purge Filter	14-Jul-2019 18:23	14-Jul-2019 18:24	0.02	General	16	No Response from Sensor	Y
VP-3	Purge Filter	17-Jul-2019 08:40	17-Jul-2019 08:41	0.02	General	16	No Response from Sensor	Y
VP-3	Purge Filter	06-Nov-2019 11:01	06-Nov-2019 11:02	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
VP-4	Dryer	13-Jul-2019 22:38	14-Jul-2019 00:00	1.36	Self Test	128	Clean Probe (Short Circuit Fault)	Y



**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**VILLE PLATTE PLANT**

**REPORTING PERIOD: July 1, 2019– December 31, 2019**

Unit	Source	Start Time	End Time	Duration Hours	Alarm Type	Status Code	Status Description	Consent Decree
VP-4	Dryer	14-Jul-2019 00:00	14-Jul-2019 02:25	2.42	Self Test	128	Clean Probe (Short Circuit Fault)	Y
VP-4	Dryer	15-Jul-2019 03:37	15-Jul-2019 03:38	0.02	Self Test	128	Clean Probe (Short Circuit Fault)	Y
VP-4	Dryer	15-Jul-2019 03:43	15-Jul-2019 08:58	5.25	Self Test	16384	Sensor in Maintenance Mode	Y
VP-4	Dryer	21-Aug-2019 02:39	21-Aug-2019 02:50	0.18	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-4	Dryer	06-Nov-2019 11:01	06-Nov-2019 11:02	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
VP-4	Dryer	04-Dec-2019 04:38	04-Dec-2019 05:14	0.60	Aspen	1	Flat Line-No New Data in 15 min	Y
VP-4	MUF	14-Jul-2019 17:14	14-Jul-2019 17:19	0.08	General	16	No Response from Sensor	Y
VP-4	MUF	06-Sep-2019 04:22	06-Sep-2019 08:21	3.98	General	16	No Response from Sensor	Y
VP-4	MUF	14-Oct-2019 20:57	14-Oct-2019 20:59	0.03	Self Test	64	Clean Probe (Contam Ring Fault)	Y
VP-4	MUF	23-Oct-2019 07:00	23-Oct-2019 14:09	7.14	Self Test	128	Clean Probe (Short Circuit Fault)	Y
VP-4	MUF	06-Nov-2019 11:01	06-Nov-2019 11:02	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
VP-4	Process Filter	14-Jul-2019 17:14	14-Jul-2019 17:19	0.08	General	16	No Response from Sensor	Y

**CABOT CORPORATION  
USEPA-LDEQ-CABOT CONSENT DECREE  
SEMIANNUAL COMPLIANCE REPORT**

**VILLE PLATTE PLANT**

**REPORTING PERIOD:** July 1, 2019– December 31, 2019

Unit	Source	Start Time	End Time	Duration Hours	Alarm Type	Status Code	Status Description	Consent Decree
VP-4	Process Filter	06-Sep-2019 04:22	06-Sep-2019 08:21	3.98	General	16	No Response from Sensor	Y
VP-4	Process Filter	06-Nov-2019 11:01	06-Nov-2019 11:02	0.01	Aspen	2	Comm Error - No Data in 15 min	Y
VP-4	Purge Filter	15-Oct-2019 11:53	16-Oct-2019 00:00	12.11	Self Test	128	Clean Probe (Short Circuit Fault)	Y
VP-4	Purge Filter	16-Oct-2019 00:00	16-Oct-2019 09:38	9.64	Self Test	128	Clean Probe (Short Circuit Fault)	Y
VP-4	Purge Filter	06-Nov-2019 11:01	06-Nov-2019 11:02	0.01	Aspen	2	Comm Error - No Data in 15 min	Y